Tab 7

LAWLER, METZGER & MILKMAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

GIL M. STROBEL
PHONE (202) 777-7728

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

October 27, 2003

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Presentation*
Performance Measurements and Standards for Interstate
Special Access Services, CC Docket No. 01-321

Dear Ms. Dortch:

On October 27, 2003, members of the Joint Competitive Industry Group (JCIG) provided the attached written *ex parte* presentation to Michelle Carey, Chief, Competition Policy Division, Wireline Competition Bureau.

In accordance with the Commission's rules, a copy is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

Gil M. Strobel

Attachment

cc: William Davenport
Ian Dillner
Michael Engel
Jeremy Miller
Christopher Olsen
Daniel Shiman
Mark Stone
Henry Thaggert
Julie Veach
Jack Yachbes

October 27, 2003

Via Electronic Delivery

Michelle Carey
Chief, Competition Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Presentation*
Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Ms. Carey:

In previous filings the Joint Competitive Industry Group (JCIG) has proposed performance measurements, standards, reporting requirements and an enforcement plan for interstate special access services provided by Tier 1 incumbent local exchange carriers (LECs). In this letter, JCIG responds to questions raised by staff and provides an update regarding reporting requirements required by the Georgia Public Service Commission (PSC). Specifically, JCIG (1) explains the need to track new installation troubles separately from the overall failure rate and the need to count each repeat trouble as a separate occurrence; (2) describes the origin of the definition of special access used in JCIG's proposal; (3) provides a definition of "no facilities" to be used in conjunction with the proposed measurements and standards; and (4) updates the record to include reports filed by BellSouth regarding ordering, provisioning, maintenance and repair of special access services in Georgia.

I. TROUBLE REPORTS (JIP-SA-8 AND JIP-SA-9)

A. The Need to Track New Installation Trouble Report Rates Separately from the Overall Failure Rate

JCIG has proposed that new installation trouble report rates be measured separately from the overall failure rate. Specifically, JCIG's New Installation Trouble Report Rate measurement (JIP-SA-8) is designed to measure the quality of incumbent LECs' installation work by capturing the rate of trouble reports on new circuits during the first thirty days after installation, while JCIG's Failure Rate measurement (JIP-SA-9), is designed to capture overall maintenance quality by measuring the total number of trouble

reports for all in-service or active circuits. This aspect of JCIG's proposal is consistent with the common industry practice of measuring installation quality separately from maintenance quality.[1]

One reason for tracking new installation troubles separately from the overall failure rate is that troubles on newly-installed circuits are particularly problematic for customers. Once special access service is installed, customers, particularly large end users, expect and need the service to function in a trouble-free manner. Multiple failures of newly-installed circuits can seriously damage a competing carrier's reputation, as well as its ability to retain customers.

A high number of troubles on newly-installed circuits also may indicate problems with the quality of the incumbent LEC's installation work or defects in the circuit itself. In addition, troubles with new installations may signal that the incumbent LEC is sacrificing work quality in an attempt to satisfy other standards, such as On Time Performance (JIP-SA-4). Therefore, it is important that incumbent LECs report on new installation troubles separately from other troubles.

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[1] *See, e.g.*, "Special Access, Intrastate Business Rules, California," Attachment 1 to SBC California's (U 1001 C) Opening Comments on Intrastate Special Access Performance Measures, Cal. PUC Docket Nos. R. 97-10-016 & I. 97-10-017 (Aug. 29, 2003) ("SBC Proposal") and *Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc.*, NY PSC Case Nos. 00-C-2051 & 92-C-0665, Order Denying Petitions for Rehearing and Clarifying Applicability of Special Services Guidelines at Appendix 3 (Dec. 20, 2001) ("NY PSC Guidelines"), both attached in pertinent part to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (Oct. 15, 2003); *Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies,* Order Implementing Proposed Revisions to the Performance Assessment Plan, Fla. PSC Docket No. 000121A-TP (Apr. 22, 2003) ("Florida Order"), attached to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (May 13, 2003); *Performance Measures for Telecommunications Interconnection, Unbundling and Resale,* Order Adopting Changes to Performance Measures, Ga. PSC Docket No. 7892-U (Nov. 14, 2002) ("Georgia Order"), attached to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (Dec. 18, 2002); Order on Reconsideration (Dec. 17, 2002), attached to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (Feb. 24, 2003) ("Georgia Reconsideration Order") (upholding the Georgia Order) (all including separate measures for new installation trouble reports and overall failure rates).

B. The Need to Count Each Trouble Report as a Separate Occurrence

An important factor in measuring installation quality is capturing the total number of troubles, including repeat troubles,[2] that occur within the first 30 days of service.[3] The fact that a circuit has already had a trouble in a 30-day period does not in any way lessen the importance of additional problems with the same circuit. Indeed, whether the repeat troubles are caused by a recurrence of a single problem or are completely unrelated to each other, the total number of troubles is an important indicator of the quality of the new circuit.

BellSouth contends that repeat troubles should be excluded from the New Installation Trouble Report Rate because they are included under the Repeat Trouble Report Rate (JIP-SA-11).[4] In fact, JIP-SA-8 and JIP-SA-11 serve two different purposes. JIP-SA-8 measures the quality of new installations, while JIP-SA-11 captures the magnitude of repeat troubles on all installed circuits to measure separately a critical dimension of an incumbent LEC's repair performance. Excluding repeat troubles from JIP-SA-8 would limit the ability to measure the quality of the circuit installed, the quality of repair service being performed on new circuits, and, ultimately, the level of customer dissatisfaction.

Omitting repeat troubles from the New Installation Trouble Report Rate would remove a significant set of data that is essential to measuring installation quality and new circuit quality, and would produce misleading and incomplete results. For example, if repeat troubles were excluded, an incumbent LEC that installed 1,000 new circuits, 10 of which generated 3 troubles each, would appear to be performing just as well as an incumbent LEC that installed 1,000 new circuits, 10 of which generated a single trouble.

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[2] JCIG has defined a "Repeat Trouble" as a "[t]rouble that reoccurs on the same telephone number/circuit ID within 30 calendar days." "Joint Competitive Industry Group Proposal, ILEC Performance Measurements & Standards in the Ordering, Provisioning, and Maintenance & Repair of Special Access Service" at 15 (Jan. 18, 2002), Attachment A to Letter from A. Richard Metzger, Jr. to Chairman Powell, FCC, CC Docket No. 01-321 (Jan. 22, 2002) ("JCIG Proposal").

[3] Troubles that are caused by customer action, customer premises equipment or those that are administrative in nature are excluded from JCIG's measurements. *See* JCIG Proposal at 11, Exclusions to Measurement JIP-SA-8.

[4] "Time Warner Telecom/BellSouth Proposal, BellSouth Performance Measurements & Standards in the Ordering, Provisioning, and Maintenance & Repair of Special Access Service" at 15 (Aug. 15, 2002), attached to Letter from W.W. Jordan, BellSouth, to Marlene Dortch, FCC, CC Docket No. 01-321 (Aug. 26, 2002) ("TWT/BellSouth Proposal").

However, the actual customer impact would be very different under the two scenarios, as the harm to the ordering carrier's reputation would be much greater in the first instance, in which each circuit experienced multiple troubles, than in the second instance, in which each circuit generated only a single trouble.

Similarly, it is important to count each trouble separately under the Failure Rate measurement (JIP-SA-9). Just as with new installations, omitting repeat troubles from the overall failure rate measurement would produce misleading and incomplete results by removing a significant set of data that is essential to measuring the overall quality of the circuits being provided by the incumbent LEC and the quality of the incumbent LECs' maintenance activities. As U.S. TelePacific explained in a complaint it recently filed against Verizon in California, multiple troubles on a single circuit harm a carrier's ability to retain the good will of the affected customers and undermines the carrier's ability to compete.[5]

In addition to measuring installation quality under JIP-SA-8 and the overall quality of all incumbent LEC-provided circuits under JIP-SA-9, it is also important to measure overall repair quality under JIP-SA-11. Indeed, it is common industry practice to isolate and evaluate repair quality through the separate measurement of repeat trouble reports occurring within 30 days of the first reported trouble, as JCIG proposes under JIP-SA-11. Measuring the Repeat Trouble Rate enables customers to identify problems with the incumbent LEC's repair processes that cause troubles to recur on circuits that supposedly have been repaired and restored by the incumbent LEC.

The record in this proceeding demonstrates that JCIG's treatment of JIP-SA-8, JIP-SA-9 and JIP-SA-11 is consistent with industry practice. For example, both the metrics adopted by the New York PSC and those submitted by SBC to the California Public Utilities Commission[6] include measurements comparable to JCIG's JIP-SA-8 (New Installation Trouble Report Rate) and JCIG's JIP-SA-9 (Failure Rate), and neither provides an exclusion for repeat reports.[7] Similarly, the Florida and Georgia Public

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[5] *See U.S. TelePacific Corp. (U-5721-C) v. Verizon California, Inc. (U-1002-C)*, Complaint (Cal. PUC, Oct. 10, 2003) attached hereto as Attachment A (alleging that U.S. TelePacific experienced multiple troubles with a single DS-3 circuit over a five-month period and that the troubles affected 27 customers). Verizon eventually resolved the trouble by moving the DS-3 to a new port, but only after several months of customer-affecting troubles had interfered with TelePacific's business operations and impaired TelePacific's relationship with its customers. *Id.* at 2.

[6] NY PSC Guidelines and SBC Proposal, *supra* note 1.

[7] JCIG also notes that Verizon's *ex parte* filing detailing its objections and concerns with the proposed JCIG metrics makes no mention of any concern about Repeat Reports being included in JIP-SA-8. *See* "A Critique of JCIG's Proposed Special Access Performance

Service Commissions both have required BellSouth to measure its interstate and intrastate special access performance against the JCIG metrics, including JIP SA-8 and JIP SA-9, and neither excluded Repeat Troubles.[8] In addition, the Florida and Georgia Commissions have also adopted JCIG's JIP-SA-11 and Qwest has proposed a comparable metric, Qwest SA-11, Repair Repeat Report Rate.[9]

II. DEFINITION OF SPECIAL ACCESS

The JCIG proposal contains the following definition of "special access"[10]:

> **Special Access** is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing ILEC end office switches.
>
> Special access services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.
>
> **Exclusions:** Transmission path requests pursuant to an Interconnection Agreement for Unbundled

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Metrics and Enforcement Mechanisms" at 17-18, attached to Letter from Dee May, Verizon, to Marlene Dortch, FCC, CC Docket No. 01-321 (Aug. 16, 2002). Similarly, Qwest's proposed measure Qwest SA-8, New Service Installation Quality, which is comparable to JIP-SA-8, does not exclude Repeat Reports; and Qwest's proposed measure Qwest-SA-9, Trouble Rate, which is comparable to JIP-SA-9, Failure Rate, does not have an exclusion for Repeat Reports. *See* "Qwest Ex Parte, Special Access Performance Measurements" at 4-5 of Attachment B, attached to Letter from John Kure, Qwest, to Marlene Dortch, FCC, CC Docket No. 01-321 (Aug 8, 2002) ("Qwest Proposal").

[8] *See* Florida Order, Georgia Order, and Georgia Reconsideration Order, *supra* note 1.

[9] *See* Florida Order at 41; Georgia Order at 5; Qwest Proposal at 6 of Attachment B.

[10] JCIG Proposal at 3.

Network Elements are excluded from these Performance Measures.

This definition was developed based on language from FCC orders and incumbent LEC tariff filings. For example, the FCC has stated that "[s]pecial access services do not use local switches; instead they employ dedicated facilities that run directly between the end user and the IXC's point of presence (POP)."[11] The FCC has also noted that "[d]edicated facilities or 'circuits' come in varying degrees of capacity, from a single voice-grade circuit, with sufficient bandwidth to carry a single voice conversation, to fiber optic circuits capable of carrying thousands of conversations simultaneously."[12] Similarly, the FCC has explained that "[t]he special access category includes a wide variety of services and facilities, such as wideband data, video, and program audio services."[13]

The definition of special access used by JCIG is also consistent with the language of the incumbent LECs' tariff filings. BellSouth's Tariff F.C.C. No. 1, for example, defines special access as a service that "provides a transmission path to connect customer designated premises or a customer designated premises and a WATS serving office either directly or through a Telephone Company Hub where bridging or channelization functions are performed. Special Access ... service includes all exchange access not utilizing Telephone Company end office switches."[14] BellSouth's tariff also includes a list of ten types of channels used to provide special access.[15] Other Tier 1 incumbent LECs have incorporated similar definitions into their special access tariffs. [16]

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[11] *Access Charge Reform,* Fifth Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd 14221, ¶ 8 (1999) (*"FCC Pricing Flexibility Order"*). As JCIG members have pointed out, this definition of special access does not specify all the types of special access connections or configurations that competitive LECs and CMRS providers currently purchase and utilize to serve end user customers.

[12] *Access Charge Reform*, Notice of Proposed Rulemaking, Third Report and Order, and Notice of Inquiry, 11 FCC Rcd 21354, ¶ 24, n.29 (1996).

[13] *Id.* ¶ 24.

[14] BellSouth Telecommunications, Inc., Tariff F.C.C. No. 1, 5th Revised Page 7-1, issued Nov. 1, 1996.

[15] *Id.* at 5th Revised Page 7-1 to 1st Revised Page 7-2.1.

[16] *See* Verizon Tariff F.C.C. No. 1 at 2nd Revised Page 7-1 to Original Page 7-3; Southwestern Bell Telephone Co. Tariff F.C.C. No. 73, 5th Revised Page 7-7 to 4th Revised Page 7-12; Sprint Local Telephone Companies Tariff F.C.C. No. 3, 1st Revised Pages 7-1 to 2nd Revised Page 7-4.

III. DEFINITION OF NO FACILITIES

Although JCIG's proposed measurements and standards refer to situations involving a "Lack of ILEC Facilities,"[17] that term is not defined in the original proposal. To ensure clarity and minimize future disputes, JCIG proposes that the following language be adopted in conjunction with the proposed measurements and standards:

> Lack of ILEC Facilities: A situation in which a requested special access facility is not available and the ILEC would have to install new aerial or buried cabling to fill the request.[18]

Consistent with the *UNE Triennial Review Order,* the Commission should also clarify that an incumbent LEC is required to perform all modifications for competing carrier customers that it would perform for its own affiliates or end user customers. Accordingly, an incumbent LEC may not claim a lack of facilities if it could provide the requested special access service by performing routine modifications or provisioning activity, including but not limited to the rearrangement or splicing of cable; the addition of a doubler or repeater, equipment case, line card, or smart jack; installation of a repeater shelf; deployment of a new multiplexer; reconfiguration of an existing multiplexer; or the addition of a drop.[19]

IV. UPDATE REGARDING DEVELOPMENT IN THE GEORGIA SPECIAL ACCESS PROCEEDING

On December 18, 2002, JCIG provided the Commission with copies of a Georgia Public Service Commission order requiring BellSouth to report its intrastate and interstate special access performance using the JCIG Metrics.[20] BellSouth has now begun filing monthly reports summarizing its special access performance for competitive LECs in the aggregate and BellSouth's own affiliates. The results from March through

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[17] *See* JIP-SA-5, JIP-SA-7.

[18] This definition is based on the FCC's determination in the *UNE Triennial Review Order* of the circumstances in which an incumbent LEC may deny access to unbundled network elements because there are "no facilities" available. *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers,* Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978, ¶¶ 634, 636 (2003) ("*Triennial Review Order*").

[19] *Triennial Review Order* ¶¶ 634, 636, 639.

[20] Georgia Order at 5.

July 2003 are attached as Attachment B.[21] Also attached (as Attachment C) is a filing made September 17, 2003 by BellSouth, correcting its previously reported calculation for SA-4, On Time Performance to FOC Due Date, for the months of March through June 2003.[22]

Respectfully submitted,

The Joint Competitive Industry Group

Robert W. Quinn, Jr.
Federal Government Affairs Vice President
AT&T Corp.

Harold Salters
Director, Federal Regulatory Affairs
T-Mobile USA, Inc.

Douglas I. Brandon
Vice President – Legal and External Affairs
AT&T Wireless Services, Inc.

Chris McKee
Director of Legal and Regulatory Affairs
XO Communications, Inc.

Cathy L. Slesinger
Senior Vice President – Public Policy
Cable & Wireless

C. Douglas Jarrett
Keller and Heckman LLP
American Petroleum Institute

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[21] The metrics reported by BellSouth are labeled "diagnostic," because Georgia has not adopted penalties associated with the JCIG metrics' standards. In addition, not all of the distribution calculations are fully presented in the reports filed with the Georgia state commission, but in some cases they are available on the BellSouth Web site, and may be made available if requested. CLECs have disputed the manner in which BellSouth calculates the annualization percentage in SA-9, Failure Rate. While BellSouth correctly counts and calculates the number of installed circuits that fail each month, BellSouth does not take that result and multiply it by 12 to achieve the annualized failure rate percentage, as the JCIG metric SA-9 prescribes. (The standard of <10% failure rate annualized is meant to show what a given month's circuit failure percentage would look like if that same rate of failure continued over a 12-month period.) Instead, BellSouth uses a rolling 12-month average number of circuit failures and percentages, which distorts the intent of the annualization calculation by masking monthly fluctuations. However, the annualization percentage in the attached June 2003 GA PSC report can still be calculated by simply multiplying the month's failure rate, separately presented by BellSouth, times 12.

[22] While BellSouth appears to have made the same mistake regarding SA-4 in its July report, it has not yet filed a correction for the most recent reporting period.

Richard J. Metzger
Senior Vice President and General Counsel
Focal Communications

Paul Kouroupas
Vice President, Regulatory Affairs
Global Crossing Ltd.

Lisa B. Smith
Director, Federal Advocacy
MCI

Kent Nakamura
Vice President and Deputy General Counsel
Nextel Communications, Inc.

Jonathan Askin, General Counsel
Association for Local Telecommunications Services

H. Russell Frisby, Jr., President
Competitive Telecommunications Association

Brian Moir
Moir & Hardman
eCommerce & Telecommunications Users Group (eTUG)

Attachments

Attachment A

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

U.S. TelePacific Corp. (U-5721-C), Complainant, v. Verizon California, Inc.(U-1002-C) Defendant.	Case No. _____

COMPLAINT

GOODIN, MACBRIDE, SQUERI,
RITCHIE & DAY, LLP
John L. Clark
505 Sansome Street, Suite 900
San Francisco, CA 94111
Telephone: (415) 765-8443
Facsimile: (415) 398-4321

Date: October 10, 2003

Attorneys for U.S. TelePacific Corp. Inc.

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

U.S. TelePacific Corp. (U-5721-C), Complainant, v. Verizon California, Inc.(U-1002-C) Defendant.	Case No. _____

COMPLAINT

Pursuant to section 1702 of the Public Utilities Code and Article 3 of the Commission's Rules of Practice and Procedure, U.S. TelePacific Corp. ("TelePacific") respectfully brings this complaint against Verizon California, Inc. ("Defendant") for violations of sections 451 and 453 of the Public Utilities Code.

I. INTRODUCTION AND STATEMENT OF COMPLAINT

TelePacific is a facilities-based interexchange and local exchange carrier serving commercial end users throughout portions of California, including territory served by Defendant. TelePacific provides its services using its own switching equipment in combination with loop and transport services acquired from other carriers, including Defendant. In many instances, using Defendant's facilities, either on a tariffed service basis or as unbundled network elements, is the only option that TelePacific has for serving its customers.

This complaint concerns very significant problems that TelePacific has encountered in attempting to obtain properly operating and maintained service from Defendant.

As detailed below, TelePacific recently suffered from inexplicable delays and failed responses on the part of Defendant to a series of customer-affecting outages that occurred on a single DS-3 transport facility over a period of five months. By contrast to the manner in which Defendant responds to trouble reports by its own retail customers, Defendant's response to TelePacific's reports began with a denial of responsibility for the outages, inadequate follow-up testing even after Defendant acknowledged that the trouble was on its network, and then a four-month delay in taking the action that actually was necessary to restore the facility to proper operating condition. In the meantime, TelePacific's customers were subjected to repeated outages over a five-month period of time, which interfered with their business operations and impaired TelePacific's relationship with them.

TelePacific submits that the events described in this complaint are not isolated occurrences, but are illustrative of the difficulties that it and other competitors often encounter when relying on Defendant for critical bottleneck facilities and services. Indeed, TelePacific believes that the described events are symptomatic of an unlawfully discriminatory and anti-competitive mindset on Defendant's part that adversely affects consumers and deprives competitors of the opportunity to compete on a fair and reasonable basis in Defendant's service territory. Indeed, this mindset has been revealed time after to time to TelePacific and other competitors in a variety of contexts, and both in formal proceedings before the Commission and in day-to-day business dealings with Defendant. Defendant repeatedly stonewalls competitors rather than taking necessary and reasonable action to remedy shortcomings in its operations and operation support systems, and often responds, even to service affecting problems, only after months of delay and legal threats.

Accordingly, TelePacific urges the Commission to impose fines on Defendant for engaging in the specific discriminatory and anti-competitive activities alleged in this complaint and to open an investigation into Defendant's discriminatory and anti-competitive behavior toward competitors, generally.

II. PARTIES

TelePacific is a public utility telephone corporation providing facilities-based and resold local, intraLATA, and interLATA telecommunications services in California pursuant to authority granted by the Commission. TelePacific's address and telephone number are as follows:

U.S. TelePacific Corp.
515 South Flower Street, 47th Floor
Los Angeles, CA 90071-2201
Tel: (213) 213-3000

Defendant is an incumbent local exchange carrier providing service to customers in various exchanges in California. Defendant's address and telephone number are as follows:

Verizon California, Inc.
711 Van Ness Avenue, Suite 300
San Francisco, CA 94102
Tel: (415) 474-9768

III. COMMUNICATIONS

All pleadings, correspondence, and other communications concerning this complaint should be directed to TelePacific's attorneys as follows:

John L. Clark
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY LLP
505 Sansome Street, Ninth Floor
San Francisco, California 94111
Telephone: (415) 765-8443
Facsimile: (415) 398-4321
E-Mail: jclark@gmssr.com

IV. FACTUAL ALLEGATIONS

1. TelePacific provides service to certain customers located in Defendant's Los Angeles service territory using, in part, a DS-3 transport facility extending between two points identified by CLLI codes as LSANCARCWHV and SLBHCAXFK03 (the "DS-3"). The DS-3 is a jurisdictionally-mixed facility acquired by TelePacific from Defendant under Defendant's interstate access tariff. The services that TelePacific provides over this facility include intrastate local and interexchange services, as well as interstate services.

2. On May 19, 2003, TelePacific received reports from a number of its customers that their service was being disrupted. TelePacific isolated this trouble to the DS-3 and immediately reported the problem to Defendant. Defendant purportedly tested the circuit, but reported that no trouble was found. The trouble cleared after TelePacific reported it; but, Defendant did not acknowledge any problem on the circuit. The trouble affected 27 customers and had a duration of 20 minutes.

3. On June 5, 2003, TelePacific received additional reports from its customers that their service was being disrupted. The trouble was reported to Defendant and, again, was isolated to the DS-3. The trouble affected 27 customers and had a duration of 40 minutes. The next day, June 6, 2003, customers reported trouble again, which lasted 21 minutes. This time, Defendant acknowledged that the trouble was on its network. However, after purportedly testing the circuit, Defendant reported that it was unable to identify the source of the trouble. Although TelePacific's records indicate that Defendant was requested to re-route the DS-3 to avoid further problems, Defendant took no further action.

4. On September 9, 2003, TelePacific once more received reports from a number of its customers that their service was being disrupted. This trouble, again, was isolated to the DS-3

and lasted 50 minutes. Defendant purportedly conducted more testing of the circuit, but took no further action.

5. One month later, on October 8, 2003, TelePacific received further reports from its customers that their service was being disrupted. This time, Defendant finally took action to affirmatively resolve the trouble by moving the DS-3 to a new port, which TelePacific had previously advised Defendant, months earlier, was required. However, because Defendant waited until this point to take that action, TelePacific's service to its end users was interrupted for 3 hours and 24 minutes during the middle of the business day.

6. TelePacific is informed and believes, and thereon alleges, that had the reported trouble affected Defendant's own retail customers, Defendant would have taken prompt action to ensure that the trouble would not recur.

7. TelePacific is informed and believes, and thereon alleges, that Defendant, as a practice, repeatedly delays taking actions that are necessary to timely address and resolve problems on its network and in its operation support systems that affect the ability of competitors to serve their customers.

8. TelePacific is informed and believes, and thereon alleges, that Defendant's behavior in this respect is the result of willful disregard of its obligation to provide facilities and services to competitors at levels of quality and timeliness that are at parity with those for services and facilities that Defendant provides to itself in order to serve its own retail customers.

9. Defendant's failure to provide just and adequate service and facilities to TelePacific, at parity with the services that it provides to itself and its retail customers, has harmed TelePacific's customers and has effectively disparaged TelePacific's service-provisioning capability in the eyes of its customers, which has adversely affected TelePacific's

ability to retain the good will of such customers and to compete.

V. BASIS FOR RELIEF

10. Defendant's failure to promptly repair the DS-3, and its failure, in general, to provide just and adequate service and facilities to TelePacific at parity with the services that Defendant provides to itself and its retail customers, constitute unlawful discrimination in violation of Public Utilities Code § 453, unjust and unreasonable practices in violation of Public Utilities Code § 451, and a violation of Defendant's obligations under the Telecommunications Act of 1996.

VI. PRAYER FOR RELIEF

WHEREFORE, TelePacific prays for relief as follows:

1. For an order that Defendant pay a fine, in the maximum allowable amount of $20,000 per day, for each day of its five-month long delay and failure to take appropriate action to resolve the trouble reported on the DS-3.

2. For an order instituting an investigation to determine the full scope of, and appropriate remedial action to address, Defendant's discriminatory and anti-competitive practices in provisioning services and facilities to competitors.

3. For such other and further relief as the Commission may deem just and proper.

VII. SCOPING INFORMATION

TelePacific requests that this matter be designated an "Adjudicatory Proceeding." TelePacific believes that an evidentiary hearing will be required.

The specific issues that need to be addressed in this proceeding are: (1) whether Defendant's failure and delay in resolving the trouble on the DS-3 was discriminatory or otherwise unjust and unreasonable; (2) whether and, if so, the extent to which, Defendant should

be fined for such failure and delay; and (3) whether there is good cause to open an investigation to determine the full scope of, and appropriate remedial action to address, Defendant's discriminatory and anti-competitive practices in provisioning services and facilities to competitors.

Proposed Schedule

(1) Answer to complaint due: thirty days after service by Commission.

(2) Evidentiary hearing to address disputed issues of fact: sixty days following filing of the answer.

(3) Opening briefs: 30 days following close of hearings.

(6) Reply briefs: 15 days following submission of opening briefs.

(7) ALJ Decision: no later than 60 days following submission of briefs.

Respectfully submitted this 10th day of October, 2003, at San Francisco, California.

GOODIN, MACBRIDE, SQUERI
RITCHIE & DAY LLP

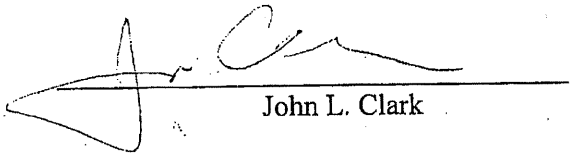
By: _____
John L. Clark

VERIFICATION BY COUNSEL

I, John L. Clark, am the attorney for TelePacific Corp., the complainant herein. Neither TelePacific nor any officer of the complainant is present in the County of San Francisco, which is where I maintain my office, and for that reason I have signed and am verifying the foregoing complaint on its behalf. I have read the complaint and am familiar with its contents. The matters stated in the complaint are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 10th day of October, 2003, at San Francisco, California.



John L. Clark

2659/001/X47731-1

Attachment B

BellSouth Monthly State Summary

Georgia II, March 2003

			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
	271 Special Access / Switched Access - Ordering										
	FOC Receipt - % Meeting Standard										
O.1.1.1	SA-1	DS0/GA (%)	Diagnostic			11.97%	259				Diagnostic
O.1.1.2	SA-1	DS1/GA (%)	Diagnostic			18.52%	1,550				Diagnostic
O.1.1.3	SA-1	DS3 (Non-Optical)/GA (%)	Diagnostic			53.39%	118				Diagnostic
O.1.1.4	SA-1	DS3 (Optical OCn)/GA (%)	Diagnostic			53.33%	15				Diagnostic
	FOC Receipt - Past Due w/o Open Query/Reject										
O.1.2.1	SA-2	DS0/GA (%)	Diagnostic			3.83%	287				Diagnostic
O.1.2.2	SA-2	DS1/GA (%)	Diagnostic			11.17%	1,621				Diagnostic
O.1.2.3	SA-2	DS3 (Non-Optical)/GA (%)	Diagnostic			20.63%	126				Diagnostic
O.1.2.4	SA-2	DS3 (Optical OCn)/GA (%)	Diagnostic			6.67%	15				Diagnostic
	FOC Receipt - Past Due with Open Query/Reject										
O.1.3.1	SA-2	DS0/GA (%)	Diagnostic			0.70%	287				Diagnostic
O.1.3.2	SA-2	DS1/GA (%)	Diagnostic			2.84%	1,621				Diagnostic
O.1.3.3	SA-2	DS3 (Non-Optical)/GA (%)	Diagnostic			7.14%	126				Diagnostic
O.1.3.4	SA-2	DS3 (Optical OCn)/GA (%)	Diagnostic			6.67%	15				Diagnostic
	Offered vs. Requested Due Date										
O.1.4.1	SA-3	DS0/GA (%)	Diagnostic			94.95%	218				Diagnostic
O.1.4.2	SA-3	DS1/GA (%)	Diagnostic			90.85%	1,202				Diagnostic
O.1.4.3	SA-3	DS3 (Non-Optical)/GA (%)	Diagnostic			96.88%	64				Diagnostic
O.1.4.4	SA-3	DS3 (Optical OCn)/GA (%)	Diagnostic			100.00%	7				Diagnostic
	271 Special Access / Switched Access - Provisioning										
	On Time Performance to FOC Due Date - with CNR consideration										
O.2.5.1	SA-4	DS0/GA (%)	Diagnostic	0.00%	5	9.70%	237				Diagnostic
O.2.5.2	SA-4	DS1/GA (%)	Diagnostic	57.14%	91	13.36%	1,722				Diagnostic
O.2.5.3	SA-4	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	1	22.99%	87				Diagnostic
O.2.5.4	SA-4	DS3 (Optical OCn)/GA (%)	Diagnostic			33.33%	9				Diagnostic
	On time Performance to FOC Due Date - without CNR consideration										
O.2.6.1	SA-4	DS0/GA (%)	Diagnostic	100.00%	5	87.34%	237				Diagnostic
O.2.6.2	SA-4	DS1/GA (%)	Diagnostic	42.86%	91	83.80%	1,722				Diagnostic
O.2.6.3	SA-4	DS3 (Non-Optical)/GA (%)	Diagnostic	100.00%	1	72.41%	87				Diagnostic
O.2.6.4	SA-4	DS3 (Optical OCn)/GA (%)	Diagnostic			22.22%	9				Diagnostic
	Average Days Late										
O.2.7.1	SA-5	DS0/GA (days)	Diagnostic			2.57	7				Diagnostic
O.2.7.2	SA-5	DS1/GA (days)	Diagnostic			5.51	49				Diagnostic
O.2.7.3	SA-5	DS3 (Non-Optical)/GA (days)	Diagnostic			3.75	4				Diagnostic
O.2.7.4	SA-5	DS3 (Optical OCn)/GA (days)	Diagnostic			15.00	4				Diagnostic
	Average Days Late Due to a Lack of BellSouth Facilities										
O.2.8.1	SA-5	DS0/GA (days)	Diagnostic								Diagnostic
O.2.8.2	SA-5	DS1/GA (days)	Diagnostic								Diagnostic
O.2.8.3	SA-5	DS3 (Non-Optical)/GA (days)	Diagnostic								Diagnostic
O.2.8.4	SA-5	DS3 (Optical OCn)/GA (days)	Diagnostic								Diagnostic
	Average Interval Requested										
O.2.9.1	SA-6	DS0/GA (days)	Diagnostic	23.20	5	9.54	237				Diagnostic
O.2.9.2	SA-6	DS1/GA (days)	Diagnostic	8.48	91	9.10	1,722				Diagnostic
O.2.9.3	SA-6	DS3 (Non-Optical)/GA (days)	Diagnostic	11.00	1	18.64	87				Diagnostic
O.2.9.4	SA-6	DS3 (Optical OCn)/GA (days)	Diagnostic			19.89	9				Diagnostic
	Average Interval Offered										
O.2.10.1	SA-6	DS0/GA (days)	Diagnostic	23.20	5	10.03	237				Diagnostic

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				Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.2.10.2	SA-6	DS1/GA (days)		Diagnostic	8.47	91	9.55	1,722				Diagnostic
O.2.10.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	11.00	1	19.05	87				Diagnostic
O.2.10.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic			15.00	9				Diagnostic
		Average Installation Interval										
O.2.11.1	SA-6	DS0/GA (days)		Diagnostic	23.20	5	9.85	237				Diagnostic
O.2.11.2	SA-6	DS1/GA (days)		Diagnostic	8.40	91	9.50	1,722				Diagnostic
O.2.11.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	11.00	1	18.70	87				Diagnostic
O.2.11.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic			22.67	9				Diagnostic
		Past Due Circuits - Total BellSouth reasons										
O.2.12.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.12.2	SA-7	DS1/GA (%)		Diagnostic			23.81%	21				Diagnostic
O.2.12.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			100.00%	1				Diagnostic
O.2.12.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits - Lack of BellSouth Facilities										
O.2.13.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.13.2	SA-7	DS1/GA (%)		Diagnostic			0.00%	21				Diagnostic
O.2.13.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.13.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits										
O.2.14.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.14.2	SA-7	DS1/GA (%)		Diagnostic			28.57%	21				Diagnostic
O.2.14.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.14.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		% Cancellations after FOC Due Date										
O.2.15.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.15.2	SA-7	DS1/GA (%)		Diagnostic			0.00%	21				Diagnostic
O.2.15.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.15.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		New Installation Trouble Report Rate										
O.2.16.1	SA-8	DS0/GA (%)		Diagnostic	0.00%	10	9.46%	296				Diagnostic
O.2.16.2	SA-8	DS1/GA (%)		Diagnostic	14.55%	110	6.98%	2,320				Diagnostic
O.2.16.3	SA-8	DS3 (Non-Optical)/GA (%)		Diagnostic	0.00%	10	0.00%	134				Diagnostic
O.2.16.4	SA-8	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	4	0.00%	20				Diagnostic
O.2.16.6	SA-8	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	13.33%	120	7.26%	2,616				Diagnostic
O.2.16.7	SA-8	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.00%	14	0.00%	154				Diagnostic
		271 Special Access / Switched Access - Maintenance and Repair										
		Failure Rate										
O.3.17.1	SA-9	DS0/GA (%)		Diagnostic	2.82%	142	3.72%	14,360				Diagnostic
O.3.17.2	SA-9	DS1/GA (%)		Diagnostic	2.75%	1,602	2.61%	59,239				Diagnostic
O.3.17.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	0.58%	171	0.46%	5,185				Diagnostic
O.3.17.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	18	0.27%	728				Diagnostic
O.3.17.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	2.75%	1,744	2.82%	73,599				Diagnostic
O.3.17.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.53%	189	0.44%	5,913				Diagnostic
		Failure Rate - Annualized										
O.3.18.1	SA-9	DS0/GA (%)		Diagnostic	2.82%	142	3.72%	14,360				Diagnostic
O.3.18.2	SA-9	DS1/GA (%)		Diagnostic	2.75%	1,602	2.61%	59,239				Diagnostic
O.3.18.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	0.58%	171	0.46%	5,185				Diagnostic
O.3.18.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	18	0.27%	728				Diagnostic
O.3.18.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	2.75%	1,744	2.82%	73,599				Diagnostic
O.3.18.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.53%	189	0.44%	5,913				Diagnostic
		Mean Time to Restore										
O.3.19.1	SA-10	DS0/GA (hours)		Diagnostic	2.79	4	2.92	534				Diagnostic

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			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.3.19.2	SA-10	DS1/GA (hours)	Diagnostic	2.92	44	3.35	1,544				Diagnostic
O.3.19.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	0.98	1	1.50	24				Diagnostic
O.3.19.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic			6.11	2				Diagnostic
O.3.19.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	2.91	48	3.24	2,078				Diagnostic
O.3.19.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	0.98	1	1.86	26				Diagnostic
		Mean Time to Restore - NTF/TOK									
O.3.20.1	SA-10	DS0/GA (hours)	Diagnostic	0.00	0	1.46	161				Diagnostic
O.3.20.2	SA-10	DS1/GA (hours)	Diagnostic	0.76	15	1.62	480				Diagnostic
O.3.20.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	0.00	0	2.68	2				Diagnostic
O.3.20.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic			0.00	0				Diagnostic
O.3.20.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	0.76	15	1.58	641				Diagnostic
O.3.20.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	0.00	0	2.68	2				Diagnostic
		Mean time to Restore - OOS > 24 Hours									
O.3.21.1	SA-10	DS0/GA (%)	Diagnostic	0.00%	4	0.19%	534				Diagnostic
O.3.21.2	SA-10	DS1/GA (%)	Diagnostic	0.00%	44	0.58%	1,544				Diagnostic
O.3.21.3	SA-10	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	1	0.00%	24				Diagnostic
O.3.21.4	SA-10	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	2				Diagnostic
O.3.21.6	SA-10	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	0.00%	48	0.48%	2,078				Diagnostic
O.3.21.7	SA-10	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	1	0.00%	26				Diagnostic
		Repeat Troubles within 30 Days									
O.3.22.1	SA-11	DS0/GA (%)	Diagnostic	25.00%	4	15.92%	534				Diagnostic
O.3.22.2	SA-11	DS1/GA (%)	Diagnostic	9.09%	44	20.98%	1,544				Diagnostic
O.3.22.3	SA-11	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	1	4.17%	24				Diagnostic
O.3.22.4	SA-11	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	2				Diagnostic
O.3.22.6	SA-11	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	10.42%	48	19.68%	2,078				Diagnostic
O.3.22.7	SA-11	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	1	3.85%	26				Diagnostic

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			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
	271 Special Access - Ordering										
	FOC Receipt - % Meeting Standard										
O.1.1.1	SA-1	DS0/GA (%)	Diagnostic			15.20%	329				Diagnostic
O.1.1.2	SA-1	DS1/GA (%)	Diagnostic			16.55%	1,589				Diagnostic
O.1.1.3	SA-1	DS3 (Non-Optical)/GA (%)	Diagnostic			52.53%	158				Diagnostic
O.1.1.4	SA-1	DS3 (Optical OCn)/GA (%)	Diagnostic			58.62%	29				Diagnostic
	FOC Receipt - Past Due w/o Open Query/Reject										
O.1.2.1	SA-2	DS0/GA (%)	Diagnostic			3.59%	334				Diagnostic
O.1.2.2	SA-2	DS1/GA (%)	Diagnostic			5.07%	1,637				Diagnostic
O.1.2.3	SA-2	DS3 (Non-Optical)/GA (%)	Diagnostic			14.62%	171				Diagnostic
O.1.2.4	SA-2	DS3 (Optical OCn)/GA (%)	Diagnostic			19.35%	31				Diagnostic
	FOC Receipt - Past Due with Open Query/Reject										
O.1.3.1	SA-2	DS0/GA (%)	Diagnostic			3.59%	334				Diagnostic
O.1.3.2	SA-2	DS1/GA (%)	Diagnostic			2.99%	1,637				Diagnostic
O.1.3.3	SA-2	DS3 (Non-Optical)/GA (%)	Diagnostic			11.70%	171				Diagnostic
O.1.3.4	SA-2	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	31				Diagnostic
	Offered vs. Requested Due Date										
O.1.4.1	SA-3	DS0/GA (%)	Diagnostic			92.31%	299				Diagnostic
O.1.4.2	SA-3	DS1/GA (%)	Diagnostic			95.31%	1,258				Diagnostic
O.1.4.3	SA-3	DS3 (Non-Optical)/GA (%)	Diagnostic			93.62%	47				Diagnostic
O.1.4.4	SA-3	DS3 (Optical OCn)/GA (%)	Diagnostic			95.45%	22				Diagnostic
	271 Special Access - Provisioning										
	On Time Performance to FOC Due Date - with CNR consideration										
O.2.5.1	SA-4	DS0/GA (%)	Diagnostic	25.00%	8	7.73%	233				Diagnostic
O.2.5.2	SA-4	DS1/GA (%)	Diagnostic	10.20%	49	16.22%	1,930				Diagnostic
O.2.5.3	SA-4	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	1	16.00%	125				Diagnostic
O.2.5.4	SA-4	DS3 (Optical OCn)/GA (%)	Diagnostic			33.33%	9				Diagnostic
	On time Performance to FOC Due Date - without CNR consideration										
O.2.6.1	SA-4	DS0/GA (%)	Diagnostic	75.00%	8	87.12%	233				Diagnostic
O.2.6.2	SA-4	DS1/GA (%)	Diagnostic	87.76%	49	81.81%	1,930				Diagnostic
O.2.6.3	SA-4	DS3 (Non-Optical)/GA (%)	Diagnostic	100.00%	1	80.00%	125				Diagnostic
O.2.6.4	SA-4	DS3 (Optical OCn)/GA (%)	Diagnostic			66.67%	9				Diagnostic
	Days Late										
O.2.7.1	SA-5	DS0/GA (days)	Diagnostic			1.75	12				Diagnostic
O.2.7.2	SA-5	DS1/GA (days)	Diagnostic	1.00	1	2.34	38				Diagnostic
O.2.7.3	SA-5	DS3 (Non-Optical)/GA (days)	Diagnostic			13.20	5				Diagnostic
O.2.7.4	SA-5	DS3 (Optical OCn)/GA (days)	Diagnostic								Diagnostic
	Average Days Late Due to a Lack of BellSouth Facilities										
O.2.8.1	SA-5	DS0/GA (days)	Diagnostic								Diagnostic
O.2.8.2	SA-5	DS1/GA (days)	Diagnostic								Diagnostic
O.2.8.3	SA-5	DS3 (Non-Optical)/GA (days)	Diagnostic								Diagnostic
O.2.8.4	SA-5	DS3 (Optical OCn)/GA (days)	Diagnostic								Diagnostic
	Average Intervals - Requested										
O.2.9.1	SA-6	DS0/GA (days)	Diagnostic	3.13	8	10.36	233				Diagnostic
O.2.9.2	SA-6	DS1/GA (days)	Diagnostic	9.22	49	8.77	1,929				Diagnostic
O.2.9.3	SA-6	DS3 (Non-Optical)/GA (days)	Diagnostic	1.00	1	11.98	125				Diagnostic
O.2.9.4	SA-6	DS3 (Optical OCn)/GA (days)	Diagnostic			18.56	9				Diagnostic
	Average Intervals - Offered										
O.2.10.1	SA-6	DS0/GA (days)	Diagnostic	3.13	8	10.56	233				Diagnostic

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			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.2.10.2	SA-6	DS1/GA (days)	Diagnostic	9.55	49	9.20	1,929				Diagnostic
O.2.10.3	SA-6	DS3 (Non-Optical)/GA (days)	Diagnostic	3.00	1	13.71	125				Diagnostic
O.2.10.4	SA-6	DS3 (Optical OCn)/GA (days)	Diagnostic			22.33	9				Diagnostic
		Average Intervals - Installation									
O.2.11.1	SA-6	DS0/GA (days)	Diagnostic	3.13	8	10.17	233				Diagnostic
O.2.11.2	SA-6	DS1/GA (days)	Diagnostic	9.12	49	9.00	1,929				Diagnostic
O.2.11.3	SA-6	DS3 (Non-Optical)/GA (days)	Diagnostic	3.00	1	15.90	125				Diagnostic
O.2.11.4	SA-6	DS3 (Optical OCn)/GA (days)	Diagnostic			24.78	9				Diagnostic
		Past Due Circuits - Total BellSouth reasons									
O.2.12.1	SA-7	DS0/GA (%)	Diagnostic			50.00%	2				Diagnostic
O.2.12.2	SA-7	DS1/GA (%)	Diagnostic			45.45%	11				Diagnostic
O.2.12.3	SA-7	DS3 (Non-Optical)/GA (%)	Diagnostic								Diagnostic
O.2.12.4	SA-7	DS3 (Optical OCn)/GA (%)	Diagnostic								Diagnostic
		Past Due Circuits - Lack of BellSouth Facilities									
O.2.13.1	SA-7	DS0/GA (%)	Diagnostic			0.00%	2				Diagnostic
O.2.13.2	SA-7	DS1/GA (%)	Diagnostic			0.00%	11				Diagnostic
O.2.13.3	SA-7	DS3 (Non-Optical)/GA (%)	Diagnostic								Diagnostic
O.2.13.4	SA-7	DS3 (Optical OCn)/GA (%)	Diagnostic								Diagnostic
		Past Due Circuits									
O.2.14.1	SA-7	DS0/GA (%)	Diagnostic			0.00%	2				Diagnostic
O.2.14.2	SA-7	DS1/GA (%)	Diagnostic			27.27%	11				Diagnostic
O.2.14.3	SA-7	DS3 (Non-Optical)/GA (%)	Diagnostic								Diagnostic
O.2.14.4	SA-7	DS3 (Optical OCn)/GA (%)	Diagnostic								Diagnostic
		% Cancellations after FOC Due Date									
O.2.15.1	SA-7	DS0/GA (%)	Diagnostic			0.00%	1				Diagnostic
O.2.15.2	SA-7	DS1/GA (%)	Diagnostic			0.00%	21				Diagnostic
O.2.15.3	SA-7	DS3 (Non-Optical)/GA (%)	Diagnostic								Diagnostic
O.2.15.4	SA-7	DS3 (Optical OCn)/GA (%)	Diagnostic								Diagnostic
		New Installation Trouble Report Rate									
O.2.16.1	SA-8	DS0/GA (%)	Diagnostic	0.00%	10	11.42%	438				Diagnostic
O.2.16.2	SA-8	DS1/GA (%)	Diagnostic	8.20%	122	6.66%	3,092				Diagnostic
O.2.16.3	SA-8	DS3 (Non-Optical)/GA (%)	Diagnostic			2.78%	144				Diagnostic
O.2.16.4	SA-8	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	10				Diagnostic
O.2.16.6	SA-8	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	7.58%	132	7.25%	3,530				Diagnostic
O.2.16.7	SA-8	DS3 and above (DS3+OCn)/GA (%)	Diagnostic			2.60%	154				Diagnostic
		271 Special Access - Maintenance and Repair									
		Failure Rate									
O.3.17.1	SA-9	DS0/GA (%)	Diagnostic	3.36%	149	3.11%	14,137				Diagnostic
O.3.17.2	SA-9	DS1/GA (%)	Diagnostic	3.25%	1,629	2.37%	59,240				Diagnostic
O.3.17.3	SA-9	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	170	0.31%	5,123				Diagnostic
O.3.17.4	SA-9	DS3 (Optical OCn)/GA (%)	Diagnostic	0.00%	18	0.14%	703				Diagnostic
O.3.17.6	SA-9	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	3.26%	1,778	2.51%	73,377				Diagnostic
O.3.17.7	SA-9	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	188	0.29%	5,826				Diagnostic
		Failure Rate - Annualized									
O.3.18.1	SA-9	DS0/GA (%)	Diagnostic	2.29%	393	3.02%	32,253				Diagnostic
O.3.18.2	SA-9	DS1/GA (%)	Diagnostic	2.48%	3,908	2.23%	132,170				Diagnostic
O.3.18.3	SA-9	DS3 (Non-Optical)/GA (%)	Diagnostic	0.20%	509	0.27%	15,026				Diagnostic
O.3.18.4	SA-9	DS3 (Optical OCn)/GA (%)	Diagnostic	0.00%	54	0.14%	2,158				Diagnostic
O.3.18.6	SA-9	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	2.46%	4,301	2.38%	164,423				Diagnostic
O.3.18.7	SA-9	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.18%	563	0.25%	17,184				Diagnostic
		Mean Time to Restore									
O.3.19.1	SA-10	DS0/GA (hours)	Diagnostic	2.92	5	2.86	440				Diagnostic

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			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.3.19.2	SA-10	DS1/GA (hours)	Diagnostic	3.28	53	3.26	1,403				Diagnostic
O.3.19.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic			1.59	16				Diagnostic
O.3.19.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic			0.72	1				Diagnostic
O.3.19.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	3.25	58	3.17	1,843				Diagnostic
O.3.19.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic			1.54	17				Diagnostic
		Mean Time to Restore - NTF/TOK									
O.3.20.1	SA-10	DS0/GA (hours)	Diagnostic	1.35	1	2.30	134				Diagnostic
O.3.20.2	SA-10	DS1/GA (hours)	Diagnostic	2.21	23	1.60	403				Diagnostic
O.3.20.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic			0.00	0				Diagnostic
O.3.20.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic			0.00	0				Diagnostic
O.3.20.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	2.18	24	1.78	537				Diagnostic
O.3.20.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic			0.00	0				Diagnostic
		Mean time to Restore - OOS > 24 Hours									
O.3.21.1	SA-10	DS0/GA (%)	Diagnostic	0.00%	5	0.00%	440				Diagnostic
O.3.21.2	SA-10	DS1/GA (%)	Diagnostic	0.00%	53	0.36%	1,403				Diagnostic
O.3.21.3	SA-10	DS3 (Non-Optical)/GA (%)	Diagnostic			0.00%	16				Diagnostic
O.3.21.4	SA-10	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	1				Diagnostic
O.3.21.6	SA-10	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	0.00%	58	0.27%	1,843				Diagnostic
O.3.21.7	SA-10	DS3 and above (DS3+OCn)/GA (%)	Diagnostic			0.00%	17				Diagnostic
		Repeat Troubles within 30 Days									
O.3.22.1	SA-11	DS0/GA (%)	Diagnostic	0.00%	5	17.50%	440				Diagnostic
O.3.22.2	SA-11	DS1/GA (%)	Diagnostic	20.75%	53	21.03%	1,403				Diagnostic
O.3.22.3	SA-11	DS3 (Non-Optical)/GA (%)	Diagnostic			12.50%	16				Diagnostic
O.3.22.4	SA-11	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	1				Diagnostic
O.3.22.6	SA-11	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	18.97%	58	20.18%	1,843				Diagnostic
O.3.22.7	SA-11	DS3 and above (DS3+OCn)/GA (%)	Diagnostic			11.76%	17				Diagnostic

BellSouth Monthly State Summary
Georgia II, May 2003

			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
	271 Special Access - Ordering										
	FOC Receipt - % Meeting Standard										
O.1.1.1	SA-1	DS0/GA (%)	Diagnostic			10.84%	323				Diagnostic
O.1.1.2	SA-1	DS1/GA (%)	Diagnostic			16.36%	1,986				Diagnostic
O.1.1.3	SA-1	DS3 (Non-Optical)/GA (%)	Diagnostic			55.33%	150				Diagnostic
O.1.1.4	SA-1	DS3 (Optical OCn)/GA (%)	Diagnostic			37.50%	24				Diagnostic
	FOC Receipt - Past Due w/o Open Query/Reject										
O.1.2.1	SA-2	DS0/GA (%)	Diagnostic			3.35%	328				Diagnostic
O.1.2.2	SA-2	DS1/GA (%)	Diagnostic			7.14%	2,060				Diagnostic
O.1.2.3	SA-2	DS3 (Non-Optical)/GA (%)	Diagnostic			5.10%	157				Diagnostic
O.1.2.4	SA-2	DS3 (Optical OCn)/GA (%)	Diagnostic			3.70%	27				Diagnostic
	FOC Receipt - Past Due with Open Query/Reject										
O.1.3.1	SA-2	DS0/GA (%)	Diagnostic			1.22%	328				Diagnostic
O.1.3.2	SA-2	DS1/GA (%)	Diagnostic			3.06%	2,060				Diagnostic
O.1.3.3	SA-2	DS3 (Non-Optical)/GA (%)	Diagnostic			4.46%	157				Diagnostic
O.1.3.4	SA-2	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	27				Diagnostic
	Offered vs. Requested Due Date										
O.1.4.1	SA-3	DS0/GA (%)	Diagnostic			92.61%	284				Diagnostic
O.1.4.2	SA-3	DS1/GA (%)	Diagnostic			94.08%	1,688				Diagnostic
O.1.4.3	SA-3	DS3 (Non-Optical)/GA (%)	Diagnostic			87.72%	57				Diagnostic
O.1.4.4	SA-3	DS3 (Optical OCn)/GA (%)	Diagnostic			100.00%	8				Diagnostic
	271 Special Access - Provisioning										
	On Time Performance to FOC Due Date - with CNR consideration										
O.2.5.1	SA-4	DS0/GA (%)	Diagnostic	17.65%	17	8.01%	362				Diagnostic
O.2.5.2	SA-4	DS1/GA (%)	Diagnostic	3.80%	79	14.71%	1,625				Diagnostic
O.2.5.3	SA-4	DS3 (Non-Optical)/GA (%)	Diagnostic	100.00%	1	22.02%	109				Diagnostic
O.2.5.4	SA-4	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	5				Diagnostic
	On time Performance to FOC Due Date - without CNR consideration										
O.2.6.1	SA-4	DS0/GA (%)	Diagnostic	76.47%	17	87.57%	362				Diagnostic
O.2.6.2	SA-4	DS1/GA (%)	Diagnostic	94.94%	79	81.97%	1,625				Diagnostic
O.2.6.3	SA-4	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	1	75.23%	109				Diagnostic
O.2.6.4	SA-4	DS3 (Optical OCn)/GA (%)	Diagnostic			100.00%	5				Diagnostic
	Days Late										
O.2.7.1	SA-5	DS0/GA (days)	Diagnostic	2.00	1	2.38	16				Diagnostic
O.2.7.2	SA-5	DS1/GA (days)	Diagnostic	3.00	1	3.02	54				Diagnostic
O.2.7.3	SA-5	DS3 (Non-Optical)/GA (days)	Diagnostic			6.33	3				Diagnostic
O.2.7.4	SA-5	DS3 (Optical OCn)/GA (days)	Diagnostic								Diagnostic
	Average Days Late Due to a Lack of BellSouth Facilities										
O.2.8.1	SA-5	DS0/GA (days)	Diagnostic								Diagnostic
O.2.8.2	SA-5	DS1/GA (days)	Diagnostic								Diagnostic
O.2.8.3	SA-5	DS3 (Non-Optical)/GA (days)	Diagnostic								Diagnostic
O.2.8.4	SA-5	DS3 (Optical OCn)/GA (days)	Diagnostic								Diagnostic
	Average Intervals - Requested										
O.2.9.1	SA-6	DS0/GA (days)	Diagnostic	7.47	17	11.04	362				Diagnostic
O.2.9.2	SA-6	DS1/GA (days)	Diagnostic	12.99	79	10.01	1,625				Diagnostic
O.2.9.3	SA-6	DS3 (Non-Optical)/GA (days)	Diagnostic	16.00	1	20.78	109				Diagnostic
O.2.9.4	SA-6	DS3 (Optical OCn)/GA (days)	Diagnostic			16.80	5				Diagnostic
	Average Intervals - Offered										
O.2.10.1	SA-6	DS0/GA (days)	Diagnostic	7.94	17	11.39	362				Diagnostic

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				Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.2.10.2	SA-6	DS1/GA (days)		Diagnostic	13.22	79	10.18	1,625				Diagnostic
O.2.10.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	16.00	1	22.08	109				Diagnostic
O.2.10.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic			18.80	5				Diagnostic
		Average Intervals - Installation										
O.2.11.1	SA-6	DS0/GA (days)		Diagnostic	8.41	17	10.94	362				Diagnostic
O.2.11.2	SA-6	DS1/GA (days)		Diagnostic	13.15	79	10.21	1,625				Diagnostic
O.2.11.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	16.00	1	20.31	109				Diagnostic
O.2.11.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic			18.80	5				Diagnostic
		Past Due Circuits - Total BellSouth reasons										
O.2.12.1	SA-7	DS0/GA (%)		Diagnostic			80.00%	40				Diagnostic
O.2.12.2	SA-7	DS1/GA (%)		Diagnostic			47.06%	34				Diagnostic
O.2.12.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.12.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits - Lack of BellSouth Facilities										
O.2.13.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	40				Diagnostic
O.2.13.2	SA-7	DS1/GA (%)		Diagnostic			0.00%	34				Diagnostic
O.2.13.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.13.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits										
O.2.14.1	SA-7	DS0/GA (%)		Diagnostic			12.50%	40				Diagnostic
O.2.14.2	SA-7	DS1/GA (%)		Diagnostic			11.76%	34				Diagnostic
O.2.14.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.14.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		% Cancellations after FOC Due Date										
O.2.15.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.15.2	SA-7	DS1/GA (%)		Diagnostic			0.00%	8				Diagnostic
O.2.15.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.15.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		New Installation Trouble Report Rate										
O.2.16.1	SA-8	DS0/GA (%)		Diagnostic	37.50%	16	13.78%	508				Diagnostic
O.2.16.2	SA-8	DS1/GA (%)		Diagnostic	13.64%	88	8.52%	3,332				Diagnostic
O.2.16.3	SA-8	DS3 (Non-Optical)/GA (%)		Diagnostic	0.00%	2	0.85%	236				Diagnostic
O.2.16.4	SA-8	DS3 (Optical OCn)/GA (%)		Diagnostic			0.00%	18				Diagnostic
O.2.16.6	SA-8	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	17.31%	104	9.22%	3,840				Diagnostic
O.2.16.7	SA-8	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.00%	2	0.79%	254				Diagnostic
		271 Special Access - Maintenance and Repair										
		Failure Rate										
O.3.17.1	SA-9	DS0/GA (%)		Diagnostic	6.63%	166	3.90%	13,924				Diagnostic
O.3.17.2	SA-9	DS1/GA (%)		Diagnostic	3.02%	1,689	3.02%	59,026				Diagnostic
O.3.17.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	1.17%	171	0.29%	5,164				Diagnostic
O.3.17.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	20	0.00%	659				Diagnostic
O.3.17.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	3.34%	1,855	3.19%	72,950				Diagnostic
O.3.17.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	1.05%	191	0.26%	5,823				Diagnostic
		Failure Rate - Annualized										
O.3.18.1	SA-9	DS0/GA (%)		Diagnostic	3.58%	559	3.29%	46,177				Diagnostic
O.3.18.2	SA-9	DS1/GA (%)		Diagnostic	2.64%	5,597	2.47%	191,196				Diagnostic
O.3.18.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	0.44%	680	0.27%	20,190				Diagnostic
O.3.18.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	74	0.11%	2,817				Diagnostic
O.3.18.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	2.73%	6,156	2.63%	237,373				Diagnostic
O.3.18.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.40%	754	0.25%	23,007				Diagnostic
		Mean Time to Restore										
O.3.19.1	SA-10	DS0/GA (hours)		Diagnostic	3.03	11	3.69	543				Diagnostic

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			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.3.19.2	SA-10	DS1/GA (hours)	Diagnostic	2.74	51	4.19	1,783				Diagnostic
O.3.19.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	1.78	2	1.67	15				Diagnostic
O.3.19.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic								Diagnostic
O.3.19.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	2.79	62	4.07	2,326				Diagnostic
O.3.19.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	1.78	2	1.67	15				Diagnostic
		Mean Time to Restore - NTF/TOK									
O.3.20.1	SA-10	DS0/GA (hours)	Diagnostic	0.47	5	1.63	196				Diagnostic
O.3.20.2	SA-10	DS1/GA (hours)	Diagnostic	0.45	12	2.15	555				Diagnostic
O.3.20.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	1.15	1	0.17	1				Diagnostic
O.3.20.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic								Diagnostic
O.3.20.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	0.45	17	2.02	751				Diagnostic
O.3.20.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	1.15	1	0.17	1				Diagnostic
		Mean time to Restore - OOS > 24 Hours									
O.3.21.1	SA-10	DS0/GA (%)	Diagnostic	0.00%	11	1.29%	543				Diagnostic
O.3.21.2	SA-10	DS1/GA (%)	Diagnostic	0.00%	51	0.90%	1,783				Diagnostic
O.3.21.3	SA-10	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	2	0.00%	15				Diagnostic
O.3.21.4	SA-10	DS3 (Optical OCn)/GA (%)	Diagnostic								Diagnostic
O.3.21.6	SA-10	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	0.00%	62	0.99%	2,326				Diagnostic
O.3.21.7	SA-10	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	2	0.00%	15				Diagnostic
		Repeat Troubles within 30 Days									
O.3.22.1	SA-11	DS0/GA (%)	Diagnostic	36.36%	11	16.02%	543				Diagnostic
O.3.22.2	SA-11	DS1/GA (%)	Diagnostic	19.61%	51	23.44%	1,783				Diagnostic
O.3.22.3	SA-11	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	2	13.33%	15				Diagnostic
O.3.22.4	SA-11	DS3 (Optical OCn)/GA (%)	Diagnostic								Diagnostic
O.3.22.6	SA-11	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	22.58%	62	21.71%	2,326				Diagnostic
O.3.22.7	SA-11	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	2	13.33%	15				Diagnostic

BellSouth Monthly State Summary

Georgia II, June 2003

				Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
	271 Special Access - Ordering											
	FOC Receipt - % Meeting Standard											
O.1.1.1	SA-1	DS0/GA (%)		Diagnostic			9.34%	257				Diagnostic
O.1.1.2	SA-1	DS1/GA (%)		Diagnostic			16.99%	1,689				Diagnostic
O.1.1.3	SA-1	DS3 (Non-Optical)/GA (%)		Diagnostic			58.50%	147				Diagnostic
O.1.1.4	SA-1	DS3 (Optical OCn)/GA (%)		Diagnostic			12.50%	8				Diagnostic
	FOC Receipt - Past Due w/o Open Query/Reject											
O.1.2.1	SA-2	DS0/GA (%)		Diagnostic			2.67%	262				Diagnostic
O.1.2.2	SA-2	DS1/GA (%)		Diagnostic			7.46%	1,757				Diagnostic
O.1.2.3	SA-2	DS3 (Non-Optical)/GA (%)		Diagnostic			1.25%	160				Diagnostic
O.1.2.4	SA-2	DS3 (Optical OCn)/GA (%)		Diagnostic			30.00%	10				Diagnostic
	FOC Receipt - Past Due with Open Query/Reject											
O.1.3.1	SA-2	DS0/GA (%)		Diagnostic			0.76%	262				Diagnostic
O.1.3.2	SA-2	DS1/GA (%)		Diagnostic			3.24%	1,757				Diagnostic
O.1.3.3	SA-2	DS3 (Non-Optical)/GA (%)		Diagnostic			6.88%	160				Diagnostic
O.1.3.4	SA-2	DS3 (Optical OCn)/GA (%)		Diagnostic			10.00%	10				Diagnostic
	Offered vs. Requested Due Date											
O.1.4.1	SA-3	DS0/GA (%)		Diagnostic			91.52%	224				Diagnostic
O.1.4.2	SA-3	DS1/GA (%)		Diagnostic			93.45%	1,328				Diagnostic
O.1.4.3	SA-3	DS3 (Non-Optical)/GA (%)		Diagnostic			86.96%	46				Diagnostic
O.1.4.4	SA-3	DS3 (Optical OCn)/GA (%)		Diagnostic			100.00%	2				Diagnostic
	271 Special Access - Provisioning											
	On Time Performance to FOC Due Date - with CNR consideration											
O.2.5.1	SA-4	DS0/GA (%)		Diagnostic	41.67%	12	11.37%	255				Diagnostic
O.2.5.2	SA-4	DS1/GA (%)		Diagnostic	14.77%	88	24.04%	1,976				Diagnostic
O.2.5.3	SA-4	DS3 (Non-Optical)/GA (%)		Diagnostic			34.94%	83				Diagnostic
O.2.5.4	SA-4	DS3 (Optical OCn)/GA (%)		Diagnostic	100.00%	3	50.00%	14				Diagnostic
	On time Performance to FOC Due Date - without CNR consideration											
O.2.6.1	SA-4	DS0/GA (%)		Diagnostic	41.67%	12	86.27%	255				Diagnostic
O.2.6.2	SA-4	DS1/GA (%)		Diagnostic	84.09%	88	73.13%	1,976				Diagnostic
O.2.6.3	SA-4	DS3 (Non-Optical)/GA (%)		Diagnostic			65.06%	83				Diagnostic
O.2.6.4	SA-4	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	3	42.86%	14				Diagnostic
	Days Late											
O.2.7.1	SA-5	DS0/GA (days)		Diagnostic	2.50	2	5.33	6				Diagnostic
O.2.7.2	SA-5	DS1/GA (days)		Diagnostic	10.00	1	2.64	56				Diagnostic
O.2.7.3	SA-5	DS3 (Non-Optical)/GA (days)		Diagnostic								Diagnostic
O.2.7.4	SA-5	DS3 (Optical OCn)/GA (days)		Diagnostic			4.00	1				Diagnostic
	Average Days Late Due to a Lack of BellSouth Facilities											
O.2.8.1	SA-5	DS0/GA (days)		Diagnostic								Diagnostic
O.2.8.2	SA-5	DS1/GA (days)		Diagnostic								Diagnostic
O.2.8.3	SA-5	DS3 (Non-Optical)/GA (days)		Diagnostic								Diagnostic
O.2.8.4	SA-5	DS3 (Optical OCn)/GA (days)		Diagnostic								Diagnostic
	Average Intervals - Requested											
O.2.9.1	SA-6	DS0/GA (days)		Diagnostic	13.25	12	10.23	255				Diagnostic
O.2.9.2	SA-6	DS1/GA (days)		Diagnostic	8.32	88	9.93	1,971				Diagnostic
O.2.9.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic			12.95	83				Diagnostic
O.2.9.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic	6.67	3	6.64	14				Diagnostic
	Average Intervals - Offered											
O.2.10.1	SA-6	DS0/GA (days)		Diagnostic	13.25	12	10.51	255				Diagnostic

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				Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.2.10.2	SA-6	DS1/GA (days)		Diagnostic	8.35	88	10.34	1,971				Diagnostic
O.2.10.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic			14.10	83				Diagnostic
O.2.10.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic	6.67	3	7.29	14				Diagnostic
		Average Intervals - Installation										
O.2.11.1	SA-6	DS0/GA (days)		Diagnostic	13.67	12	10.71	255				Diagnostic
O.2.11.2	SA-6	DS1/GA (days)		Diagnostic	8.47	88	10.31	1,971				Diagnostic
O.2.11.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic			14.06	83				Diagnostic
O.2.11.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic	7.67	3	9.86	14				Diagnostic
		Past Due Circuits - Total BellSouth reasons										
O.2.12.1	SA-7	DS0/GA (%)		Diagnostic			57.14%	7				Diagnostic
O.2.12.2	SA-7	DS1/GA (%)		Diagnostic			29.17%	24				Diagnostic
O.2.12.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			80.00%	5				Diagnostic
O.2.12.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits - Lack of BellSouth Facilities										
O.2.13.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	7				Diagnostic
O.2.13.2	SA-7	DS1/GA (%)		Diagnostic			0.00%	24				Diagnostic
O.2.13.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			0.00%	5				Diagnostic
O.2.13.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits										
O.2.14.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	7				Diagnostic
O.2.14.2	SA-7	DS1/GA (%)		Diagnostic			41.67%	24				Diagnostic
O.2.14.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			0.00%	5				Diagnostic
O.2.14.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		% Cancellations after FOC Due Date										
O.2.15.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	37				Diagnostic
O.2.15.2	SA-7	DS1/GA (%)		Diagnostic			0.00%	20				Diagnostic
O.2.15.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.15.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		New Installation Trouble Report Rate										
O.2.16.1	SA-8	DS0/GA (%)		Diagnostic	31.58%	38	10.54%	740				Diagnostic
O.2.16.2	SA-8	DS1/GA (%)		Diagnostic	14.47%	152	7.07%	2,914				Diagnostic
O.2.16.3	SA-8	DS3 (Non-Optical)/GA (%)		Diagnostic	100.00%	2	0.86%	232				Diagnostic
O.2.16.4	SA-8	DS3 (Optical OCn)/GA (%)		Diagnostic			0.00%	8				Diagnostic
O.2.16.6	SA-8	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	17.89%	190	7.77%	3,654				Diagnostic
O.2.16.7	SA-8	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	100.00%	2	0.83%	240				Diagnostic
		271 Special Access - Maintenance and Repair										
		Failure Rate										
O.3.17.1	SA-9	DS0/GA (%)		Diagnostic	8.19%	171	4.80%	13,635				Diagnostic
O.3.17.2	SA-9	DS1/GA (%)		Diagnostic	2.95%	1,760	2.72%	59,361				Diagnostic
O.3.17.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	1.88%	160	0.74%	5,155				Diagnostic
O.3.17.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	4.76%	21	0.44%	676				Diagnostic
O.3.17.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	3.42%	1,931	3.11%	72,996				Diagnostic
O.3.17.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	2.21%	181	0.70%	5,831				Diagnostic
		Failure Rate - Annualized										
O.3.18.1	SA-9	DS0/GA (%)		Diagnostic	4.66%	730	3.63%	59,812				Diagnostic
O.3.18.2	SA-9	DS1/GA (%)		Diagnostic	2.72%	7,357	2.53%	250,557				Diagnostic
O.3.18.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	0.71%	840	0.37%	25,345				Diagnostic
O.3.18.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	1.05%	95	0.17%	3,493				Diagnostic
O.3.18.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	2.89%	8,087	2.74%	310,369				Diagnostic
O.3.18.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.75%	935	0.34%	28,838				Diagnostic
		Mean Time to Restore										
O.3.19.1	SA-10	DS0/GA (hours)		Diagnostic	1.48	14	2.75	654				Diagnostic

BellSouth Monthly State Summary
Georgia II, June 2003

			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.3.19.2	SA-10	DS1/GA (hours)	Diagnostic	2.97	52	3.63	1,616				Diagnostic
O.3.19.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	1.36	3	1.32	38				Diagnostic
O.3.19.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic	5.12	1	5.90	3				Diagnostic
O.3.19.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	2.66	66	3.38	2,270				Diagnostic
O.3.19.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	2.30	4	1.66	41				Diagnostic
		Mean Time to Restore - NTF/TOK									
O.3.20.1	SA-10	DS0/GA (hours)	Diagnostic	0.71	8	1.40	202				Diagnostic
O.3.20.2	SA-10	DS1/GA (hours)	Diagnostic	0.99	14	1.60	484				Diagnostic
O.3.20.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	0.53	1	1.17	9				Diagnostic
O.3.20.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic	5.12	1	0.45	1				Diagnostic
O.3.20.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	0.89	22	1.54	686				Diagnostic
O.3.20.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	2.83	2	1.10	10				Diagnostic
		Mean time to Restore - OOS > 24 Hours									
O.3.21.1	SA-10	DS0/GA (%)	Diagnostic	0.00%	14	0.46%	654				Diagnostic
O.3.21.2	SA-10	DS1/GA (%)	Diagnostic	0.00%	52	0.56%	1,616				Diagnostic
O.3.21.3	SA-10	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	3	0.00%	38				Diagnostic
O.3.21.4	SA-10	DS3 (Optical OCn)/GA (%)	Diagnostic	0.00%	1	0.00%	3				Diagnostic
O.3.21.6	SA-10	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	0.00%	66	0.53%	2,270				Diagnostic
O.3.21.7	SA-10	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	4	0.00%	41				Diagnostic
		Repeat Troubles within 30 Days									
O.3.22.1	SA-11	DS0/GA (%)	Diagnostic	21.43%	14	19.27%	654				Diagnostic
O.3.22.2	SA-11	DS1/GA (%)	Diagnostic	23.08%	52	22.22%	1,616				Diagnostic
O.3.22.3	SA-11	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	3	5.26%	38				Diagnostic
O.3.22.4	SA-11	DS3 (Optical OCn)/GA (%)	Diagnostic	0.00%	1	0.00%	3				Diagnostic
O.3.22.6	SA-11	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	22.73%	66	21.37%	2,270				Diagnostic
O.3.22.7	SA-11	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	4	4.88%	41				Diagnostic

BellSouth Monthly State Summary

Georgia II, July 2003

				Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
	271 Special Access - Ordering											
	FOC Receipt - % Meeting Standard											
O.1.1.1	SA-1	DS0/GA (%)		Diagnostic			12.99%	331				Diagnostic
O.1.1.2	SA-1	DS1/GA (%)		Diagnostic			15.48%	1,725				Diagnostic
O.1.1.3	SA-1	DS3 (Non-Optical)/GA (%)		Diagnostic			48.92%	186				Diagnostic
O.1.1.4	SA-1	DS3 (Optical OCn)/GA (%)		Diagnostic			6.25%	16				Diagnostic
	FOC Receipt - Past Due w/o Open Query/Reject											
O.1.2.1	SA-2	DS0/GA (%)		Diagnostic			5.04%	337				Diagnostic
O.1.2.2	SA-2	DS1/GA (%)		Diagnostic			6.37%	1,822				Diagnostic
O.1.2.3	SA-2	DS3 (Non-Optical)/GA (%)		Diagnostic			4.04%	198				Diagnostic
O.1.2.4	SA-2	DS3 (Optical OCn)/GA (%)		Diagnostic			0.00%	16				Diagnostic
	FOC Receipt - Past Due with Open Query/Reject											
O.1.3.1	SA-2	DS0/GA (%)		Diagnostic			1.19%	337				Diagnostic
O.1.3.2	SA-2	DS1/GA (%)		Diagnostic			3.57%	1,822				Diagnostic
O.1.3.3	SA-2	DS3 (Non-Optical)/GA (%)		Diagnostic			7.07%	198				Diagnostic
O.1.3.4	SA-2	DS3 (Optical OCn)/GA (%)		Diagnostic			6.25%	16				Diagnostic
	Offered vs. Requested Due Date											
O.1.4.1	SA-3	DS0/GA (%)		Diagnostic			87.58%	298				Diagnostic
O.1.4.2	SA-3	DS1/GA (%)		Diagnostic			91.99%	1,386				Diagnostic
O.1.4.3	SA-3	DS3 (Non-Optical)/GA (%)		Diagnostic			95.18%	83				Diagnostic
O.1.4.4	SA-3	DS3 (Optical OCn)/GA (%)		Diagnostic			100.00%	7				Diagnostic
	271 Special Access - Provisioning											
	On Time Performance to FOC Due Date - with CNR consideration											
O.2.5.1	SA-4	DS0/GA (%)		Diagnostic	6.12%	49	8.89%	225				Diagnostic
O.2.5.2	SA-4	DS1/GA (%)		Diagnostic	37.69%	130	18.89%	1,805				Diagnostic
O.2.5.3	SA-4	DS3 (Non-Optical)/GA (%)		Diagnostic	12.50%	8	29.13%	103				Diagnostic
O.2.5.4	SA-4	DS3 (Optical OCn)/GA (%)		Diagnostic	50.00%	2	42.86%	7				Diagnostic
	On time Performance to FOC Due Date - without CNR consideration											
O.2.6.1	SA-4	DS0/GA (%)		Diagnostic	91.84%	49	88.44%	225				Diagnostic
O.2.6.2	SA-4	DS1/GA (%)		Diagnostic	60.77%	130	76.01%	1,805				Diagnostic
O.2.6.3	SA-4	DS3 (Non-Optical)/GA (%)		Diagnostic	87.50%	8	68.93%	103				Diagnostic
O.2.6.4	SA-4	DS3 (Optical OCn)/GA (%)		Diagnostic	50.00%	2	42.86%	7				Diagnostic
	Days Late											
O.2.7.1	SA-5	DS0/GA (days)		Diagnostic	1.00	1	3.50	6				Diagnostic
O.2.7.2	SA-5	DS1/GA (days)		Diagnostic	1.00	2	10.20	92				Diagnostic
O.2.7.3	SA-5	DS3 (Non-Optical)/GA (days)		Diagnostic			4.00	2				Diagnostic
O.2.7.4	SA-5	DS3 (Optical OCn)/GA (days)		Diagnostic			3.00	1				Diagnostic
	Average Days Late Due to a Lack of BellSouth Facilities											
O.2.8.1	SA-5	DS0/GA (days)		Diagnostic								Diagnostic
O.2.8.2	SA-5	DS1/GA (days)		Diagnostic								Diagnostic
O.2.8.3	SA-5	DS3 (Non-Optical)/GA (days)		Diagnostic								Diagnostic
O.2.8.4	SA-5	DS3 (Optical OCn)/GA (days)		Diagnostic								Diagnostic
	Average Intervals - Requested											
O.2.9.1	SA-6	DS0/GA (days)		Diagnostic	9.02	49	8.74	225				Diagnostic
O.2.9.2	SA-6	DS1/GA (days)		Diagnostic	9.67	130	9.05	1,805				Diagnostic
O.2.9.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	15.25	8	11.63	103				Diagnostic
O.2.9.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic	6.50	2	17.57	7				Diagnostic
	Average Intervals - Offered											
O.2.10.1	SA-6	DS0/GA (days)		Diagnostic	9.02	49	9.15	225				Diagnostic

BellSouth Monthly State Summary
Georgia II, July 2003

				Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.2.10.2	SA-6	DS1/GA (days)		Diagnostic	9.67	130	9.34	1,805				Diagnostic
O.2.10.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	15.00	8	14.32	103				Diagnostic
O.2.10.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic	6.50	2	16.86	7				Diagnostic
		Average Intervals - Installation										
O.2.11.1	SA-6	DS0/GA (days)		Diagnostic	9.04	49	8.83	225				Diagnostic
O.2.11.2	SA-6	DS1/GA (days)		Diagnostic	9.65	130	9.94	1,805				Diagnostic
O.2.11.3	SA-6	DS3 (Non-Optical)/GA (days)		Diagnostic	15.13	8	13.16	103				Diagnostic
O.2.11.4	SA-6	DS3 (Optical OCn)/GA (days)		Diagnostic	6.50	2	19.43	7				Diagnostic
		Past Due Circuits - Total BellSouth reasons										
O.2.12.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.12.2	SA-7	DS1/GA (%)		Diagnostic	100.00%	1	40.00%	70				Diagnostic
O.2.12.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.12.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits - Lack of BellSouth Facilities										
O.2.13.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	1				Diagnostic
O.2.13.2	SA-7	DS1/GA (%)		Diagnostic	0.00%	1	0.00%	70				Diagnostic
O.2.13.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.13.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		Past Due Circuits										
O.2.14.1	SA-7	DS0/GA (%)		Diagnostic			100.00%	1				Diagnostic
O.2.14.2	SA-7	DS1/GA (%)		Diagnostic	0.00%	1	15.71%	70				Diagnostic
O.2.14.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.14.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		% Cancellations after FOC Due Date										
O.2.15.1	SA-7	DS0/GA (%)		Diagnostic			0.00%	4				Diagnostic
O.2.15.2	SA-7	DS1/GA (%)		Diagnostic	0.00%	1	0.00%	17				Diagnostic
O.2.15.3	SA-7	DS3 (Non-Optical)/GA (%)		Diagnostic								Diagnostic
O.2.15.4	SA-7	DS3 (Optical OCn)/GA (%)		Diagnostic								Diagnostic
		New Installation Trouble Report Rate										
O.2.16.1	SA-8	DS0/GA (%)		Diagnostic	30.00%	30	11.11%	675				Diagnostic
O.2.16.2	SA-8	DS1/GA (%)		Diagnostic	13.24%	204	8.07%	5,091				Diagnostic
O.2.16.3	SA-8	DS3 (Non-Optical)/GA (%)		Diagnostic			2.25%	267				Diagnostic
O.2.16.4	SA-8	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	3	8.00%	75				Diagnostic
O.2.16.6	SA-8	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	15.38%	234	8.43%	5,766				Diagnostic
O.2.16.7	SA-8	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.00%	3	3.51%	342				Diagnostic
		271 Special Access - Maintenance and Repair										
		Failure Rate										
O.3.17.1	SA-9	DS0/GA (%)		Diagnostic	5.85%	205	4.87%	13,367				Diagnostic
O.3.17.2	SA-9	DS1/GA (%)		Diagnostic	3.96%	1,870	3.31%	59,224				Diagnostic
O.3.17.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	1.23%	162	0.48%	5,190				Diagnostic
O.3.17.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	0.00%	21	0.30%	667				Diagnostic
O.3.17.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	4.14%	2,075	3.59%	72,591				Diagnostic
O.3.17.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	1.09%	183	0.46%	5,857				Diagnostic
		Failure Rate - Annualized										
O.3.18.1	SA-9	DS0/GA (%)		Diagnostic	4.92%	935	3.86%	73,179				Diagnostic
O.3.18.2	SA-9	DS1/GA (%)		Diagnostic	2.97%	9,227	2.68%	309,781				Diagnostic
O.3.18.3	SA-9	DS3 (Non-Optical)/GA (%)		Diagnostic	0.80%	1,002	0.39%	30,535				Diagnostic
O.3.18.4	SA-9	DS3 (Optical OCn)/GA (%)		Diagnostic	0.86%	116	0.19%	4,160				Diagnostic
O.3.18.6	SA-9	Below DS3 (DS0+DS1)/GA (%)		Diagnostic	3.15%	10,162	2.91%	382,960				Diagnostic
O.3.18.7	SA-9	DS3 and above (DS3+OCn)/GA (%)		Diagnostic	0.81%	1,118	0.36%	34,695				Diagnostic
		Mean Time to Restore										
O.3.19.1	SA-10	DS0/GA (hours)		Diagnostic	3.89	12	3.32	651				Diagnostic

BellSouth Monthly State Summary
Georgia II, July 2003

			Benchmark/ Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	Zscore	Equity
O.3.19.2	SA-10	DS1/GA (hours)	Diagnostic	3.11	74	3.69	1,958				Diagnostic
O.3.19.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	0.38	2	1.84	25				Diagnostic
O.3.19.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic			0.62	2				Diagnostic
O.3.19.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	3.22	86	3.60	2,609				Diagnostic
O.3.19.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	0.38	2	1.75	27				Diagnostic
		Mean Time to Restore - NTF/TOK									
O.3.20.1	SA-10	DS0/GA (hours)	Diagnostic	1.84	2	1.72	231				Diagnostic
O.3.20.2	SA-10	DS1/GA (hours)	Diagnostic	2.34	21	1.53	583				Diagnostic
O.3.20.3	SA-10	DS3 (Non-Optical)/GA (hours)	Diagnostic	0.00	0	1.24	9				Diagnostic
O.3.20.4	SA-10	DS3 (Optical OCn)/GA (hours)	Diagnostic			0.62	2				Diagnostic
O.3.20.6	SA-10	Below DS3 (DS0+DS1)/GA (hours)	Diagnostic	2.30	23	1.58	814				Diagnostic
O.3.20.7	SA-10	DS3 and above (DS3+OCn)/GA (hours)	Diagnostic	0.00	0	1.13	11				Diagnostic
		Mean time to Restore - OOS > 24 Hours									
O.3.21.1	SA-10	DS0/GA (%)	Diagnostic	0.00%	12	0.77%	651				Diagnostic
O.3.21.2	SA-10	DS1/GA (%)	Diagnostic	0.00%	74	0.82%	1,958				Diagnostic
O.3.21.3	SA-10	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	2	0.00%	25				Diagnostic
O.3.21.4	SA-10	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	2				Diagnostic
O.3.21.6	SA-10	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	0.00%	86	0.80%	2,609				Diagnostic
O.3.21.7	SA-10	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	2	0.00%	27				Diagnostic
		Repeat Troubles within 30 Days									
O.3.22.1	SA-11	DS0/GA (%)	Diagnostic	25.00%	12	22.12%	651				Diagnostic
O.3.22.2	SA-11	DS1/GA (%)	Diagnostic	25.68%	74	22.88%	1,958				Diagnostic
O.3.22.3	SA-11	DS3 (Non-Optical)/GA (%)	Diagnostic	0.00%	2	12.00%	25				Diagnostic
O.3.22.4	SA-11	DS3 (Optical OCn)/GA (%)	Diagnostic			0.00%	2				Diagnostic
O.3.22.6	SA-11	Below DS3 (DS0+DS1)/GA (%)	Diagnostic	25.58%	86	22.69%	2,609				Diagnostic
O.3.22.7	SA-11	DS3 and above (DS3+OCn)/GA (%)	Diagnostic	0.00%	2	11.11%	27				Diagnostic

Attachment C

BellSouth Telecommunications, Inc.
Legal Department
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel - Georgia

404 986 1718
Fax 404 986 1800

September 17, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334-5701

Re: *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale*; Docket No. 7892-U

Dear Mr. McAlister:

Enclosed please find the original and seventeen (17) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s ("BellSouth") Revised Service Quality Measurement ("SQM") Report for Measure SA-4 (On Time Performance To Firm Order Confirmation (FOC) Due Date) for March, April, May, and June 2003. After these reports were posted, BellSouth discovered errors in the calculation of the data, which have since been corrected. I would appreciate your filing same and returning the two (2) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Yours very truly,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Mr. Leon Bowles (via electronic mail)
Parties of Record (via electronic mail)

504315/505312

GA - On Time Performance to FOC Due Date - March 2003					
Aggregate	State Code	Product Category	Product	Percentage On Time Performance with CNR Consideration	Percentage On Time Performance without CNR Consideration
IXC	GA	Special Access	Special Access DS0	97.86%	95.73%
IXC	GA	Special Access	Special Access DS1	99.29%	94.91%
IXC	GA	Special Access	Special Access DS3 (Non-Optical)	98.81%	88.10%
IXC	GA	Special Access	Special Access DS3 (Optical OCn)	100.00%	40.00%
IXC	GA	Special Access	Below DS3 (DS0 + DS1)	99.12%	95.01%
IXC	GA	Special Access	DS3 and Above (DS3 + OCn)	98.88%	85.39%
BSLD	GA	Special Access	Special Access DS0	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS1	100.00%	93.41%
BSLD	GA	Special Access	Special Access DS3 (Non-Optical)	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS3 (Optical OCn)	0.00%	0.00%
BSLD	GA	Special Access	Below DS3 (DS0 + DS1)	100.00%	93.75%
BSLD	GA	Special Access	DS3 and Above (DS3 + OCn)	100.00%	100.00%

GA - On Time Performance to FOC Due Date - April 2003					
Aggregate	State Code	Product Category	Product	Percentage On Time Performance with CNR Consideration	Percentage On Time Performance without CNR Consideration
IXC	GA	Special Access	Special Access DS0	96.93%	96.49%
IXC	GA	Special Access	Special Access DS1	99.00%	94.81%
IXC	GA	Special Access	Special Access DS3 (Non-Optical)	99.17%	86.78%
IXC	GA	Special Access	Special Access DS3 (Optical OCn)	100.00%	88.89%
IXC	GA	Special Access	Below DS3 (DS0 + DS1)	98.78%	94.99%
IXC	GA	Special Access	DS3 and Above (DS3 + OCn)	99.23%	86.92%
BSLD	GA	Special Access	Special Access DS0	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS1	100.00%	95.83%
BSLD	GA	Special Access	Special Access DS3 (Non-Optical)	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS3 (Optical OCn)	0.00%	0.00%
BSLD	GA	Special Access	Below DS3 (DS0 + DS1)	100.00%	96.43%
BSLD	GA	Special Access	DS3 and Above (DS3 + OCn)	100.00%	100.00%

GA - On Time Performance to FOC Due Date - May 2003					
Aggregate	State Code	Product Category	Product	Percentage On Time Performance with CNR Consideration	Percentage On Time Performance without CNR Consideration
IXC	GA	Special Access	Special Access DS0	97.41%	95.97%
IXC	GA	Special Access	Special Access DS1	98.79%	95.05%
IXC	GA	Special Access	Special Access DS3 (Non-Optical)	100.00%	91.51%
IXC	GA	Special Access	Special Access DS3 (Optical OCn)	100.00%	100.00%
IXC	GA	Special Access	Below DS3 (DS0 + DS1)	99.69%	82.07%
IXC	GA	Special Access	DS3 and Above (DS3 + OCn)	100.00%	91.89%
BSLD	GA	Special Access	Special Access DS0	100.00%	87.50%
BSLD	GA	Special Access	Special Access DS1	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS3 (Non-Optical)	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS3 (Optical OCn)	0.00%	0.00%
BSLD	GA	Special Access	Below DS3 (DS0 + DS1)	100.00%	97.87%
BSLD	GA	Special Access	DS3 and Above (DS3 + OCn)	100.00%	100.00%

GA - On Time Performance to FOC Due Date - June 2003					
Aggregate	State Code	Product Category	Product	Percentage On Time Performance with CNR Consideration	Percentage On Time Performance without CNR Consideration
IXC	GA	Special Access	Special Access DS0	97.63%	94.86%
IXC	GA	Special Access	Special Access DS1	98.45%	91.17%
IXC	GA	Special Access	Special Access DS3 (Non-Optical)	100.00%	80.72%
IXC	GA	Special Access	Special Access DS3 (Optical OCn)	100.00%	53.85%
IXC	GA	Special Access	Below DS3 (DS0 + DS1)	98.36%	91.59%
IXC	GA	Special Access	DS3 and Above (DS3 + OCn)	100.00%	77.08%
BSLD	GA	Special Access	Special Access DS0	100.00%	100.00%
BSLD	GA	Special Access	Special Access DS1	100.00%	98.85%
BSLD	GA	Special Access	Special Access DS3 (Non-Optical)	0.00%	0.00%
BSLD	GA	Special Access	Special Access DS3 (Optical OCn)	100.00%	66.67%
BSLD	GA	Special Access	Below DS3 (DS0 + DS1)	100.00%	98.97%
BSLD	GA	Special Access	DS3 and Above (DS3 + OCn)	100.00%	66.67%

Tab 8

LAWLER, METZGER & MILKMAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

GIL M. STROBEL
PHONE (202) 777-7728

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

February 26, 2004

Via Electronic Delivery

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Written Ex Parte*
Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Ms. Dortch:

Attached is a letter from the Joint Competitive Industry Group to Chairman Michael K. Powell. Pursuant to the Commission's rules, 47 C.F.R. § 1.1206(b), this letter is being provided to you for inclusion in the public record of the above-referenced proceeding. Please do not hesitate to contact me if you have any questions regarding this submission.

Sincerely,

Gil M. Strobel

Attachment

cc: Scott Bergmann
Michael Engel
Daniel Gonzalez
Jennifer Manner
Rodney McDonald
Bryan Tramont
Sheryl Wilkerson
Matthew Brill
Samuel Feder
Christopher Libertelli
Paul Margie
Barry Ohlson
Henry Thaggert
Ian Dillner
Jordan Goldstein
William Maher
Pamela Megna
Jessica Rosenworcel
Julie Veach

February 26, 2004

Via Electronic Filing

Chairman Michael K. Powell
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Presentation*
In the Matter of Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Chairman Powell:

In previous filings the Joint Competitive Industry Group (JCIG) has proposed performance measurements, standards, and reporting requirements as well as an enforcement plan for governing interstate special access services provided by Tier 1 incumbent local exchange carriers (LECs).[1] JCIG's proposal is designed to improve incumbent LECs' performance in this important area through the use of a concise set of metrics and an easily-administered enforcement process.

In this letter, JCIG responds to specific claims that the Bell Operating Companies (BOCs) made in a presentation they filed in support of their position that special access performance measurements are unnecessary.[2] As the attached document shows, the BOCs' claims are without merit and ignore the facts in the record of this proceeding as well as the marketplace realities experienced by the end users, wireless carriers, and competitive LECs that constitute JCIG. In particular, JCIG responds to the BOCs' claims by explaining that: the special access market is not competitive; the BOCs' tariffs do not provide sufficient performance guarantees to ensure adequate performance; the BOCs'

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[1] *See ex parte* letter from A. Richard Metzger, Jr. to Magalie Salas, CC Docket No. 01-321 (Jan. 22, 2002) (attaching JCIG Proposal, "ILEC Performance Measurements & Standards in the Ordering, Provisioning, and Maintenance & Repair of Special Access Service"); *ex parte* letter from A. Richard Metzger, Jr. to William Caton, CC Docket No. 01-321 (Feb. 12, 2002) (attaching JCIG Proposal, "Essential Elements of a Special Access Provisioning Enforcement Plan"); *ex parte* letter from Ruth Milkman to Marlene Dortch, CC Docket No. 01-321 (June 18, 2002) (attaching JCIG Proposal Regarding Special Access Provisioning Remedies).

[2] *Ex parte* letter from Kathleen B. Levitz, BellSouth to Marlene Dortch, FCC, CC Docket No. 01-321 (Nov. 6, 2003).

special access performance is far from adequate; the BOCs' overwhelming market power makes it virtually impossible for customers to engage in meaningful negotiations with the BOCs; the JCIG proposal is realistic, achievable and necessary; the reports that the BOCs currently provide are severely deficient in both quality and scope; and enforcement efforts have been thwarted because objective measurements or standards for special access provisioning are non-existent.

The Commission should reject the BOCs' attempts to deny the problems with special access performance. Instead, the FCC should address the issue head-on by adopting JCIG's comprehensive solution, which incorporates meaningful measures, standards and enforcement mechanisms. Otherwise, the current problems with incumbent LEC special access performance will continue to persist, hampering competition and depriving consumers of access to timely and reliable service.

Respectfully submitted,

The Joint Competitive Industry Group

Attachment

The Need for Special Access Metrics: Why the Status Quo is Unacceptable

BOCs' claim: The special access market is competitive.

> **JCIG's response**: The special access market is far from competitive, a point reinforced by the FCC's finding in the *UNE Triennial Review Order* that there are few alternatives to incumbent LEC high capacity loops and transport nationwide. The record in the special access metrics proceeding demonstrates that competitive local exchange carriers (LECs) and long distance carriers are heavily dependent on incumbent LECs for the last mile links needed to connect competitive networks to end-user customers. Wireless carriers are especially dependent, relying on the incumbent LECs for approximately 90-95% of the facilities used to connect base stations with mobile switching centers. To the extent competitive alternatives exist, they are most frequently deployed between incumbent LEC switching wire centers and IXC POPs in large urban areas and not in the areas where most end users and wireless carriers seek special access service.

BOCs' claim: Interstate special access tariffs provide performance guarantees.

> **JCIG's response**: First and foremost, the JCIG membership is unified in its view that the critical goal is reasonable and reliable special access performance by the incumbent LECs – not monetary penalties. In addition, the incumbent LECs do not provide sufficient documentation to allow for independent auditing, making it impossible for customers to determine whether they are receiving the credits required by the tariffs. The metrics in the tariffs also lack clearly defined business rules. The end result is that the existing performance guarantees do not provide sufficient incentives to drive incumbent LECs to improve special access performance, as evidenced by their continued poor performance.

BOCs' claim: They are committed to, and are improving, their "very good service" to their special access customers.

> **JCIG's response**: The BOCs' claims of improved performance suffer from several flaws:
>
> - First, the BOCs' claims are based on unaudited ARMIS reports. ARMIS reporting does not include service provided to competitive LECs, CMRS providers, incumbent LEC affiliates or retail customers and is not disaggregated by carrier or type of circuit. In addition, most ARMIS data is reported on an annual basis, making it difficult for customers to obtain timely remedies for poor performance. ARMIS also lacks clear business rules. The lack of express and consistent definitions and business rules allows each incumbent LEC to measure performance differently and gives the incumbent LECs great latitude when reporting on their performance. For example, the ARMIS metric for Total Trouble Reports does not define what constitutes a trouble report, leaving it up to the individual LEC to

decide what to include in the metric. Similarly, the ARMIS metric for Percentage Commitment Met is based on incumbent LEC installation intervals, but these intervals are not defined, and customers have had difficulty obtaining the applicable intervals. Rather than relying on ARMIS, the FCC should use its authority to require the BOCs to file the reports they provide to individual customers. These reports, which the customers cannot file due to non-disclosure requirements, would provide the FCC a more accurate view of the BOCs' performance.

- Second, it is unclear how the BOCs derived the "ILEC Average" listed in their presentation.

- Third, the "improvement" shown is based on a relatively low baseline. Performance remains unacceptably poor.

    - Several carriers have filed complaints regarding incumbent LEC special access performance. For example, Time Warner Telecom filed a complaint against BellSouth; MCI filed a complaint against U S WEST; Cable & Wireless filed a complaint against Verizon; Focal filed a complaint at the New York Commission against Verizon; U.S. Telepacific filed a complaint against Verizon with the California Commission; and AT&T filed a series of complaints against U S WEST with various state commissions, including Colorado, Minnesota and others.

        - The FCC's Enforcement Bureau has advised several carriers that without the establishment of objective measurements and standards, competitors will have great difficulty demonstrating that incumbent LEC performance is unjustly or unreasonably poor.

        - Incumbent LECs impose non-disclosure provisions on the reports they provide competing carriers, prohibiting carriers from using the incumbent LECs' reports in any regulatory or court proceeding. Moreover, the business rules and reporting provided are not consistent among the incumbent LECs, making it exceedingly difficult to demonstrate effectively that a particular incumbent LEC's performance was unreasonable.

BOCs' claim: Negotiation can accomplish the policy goals of a performance assurance plan and is a better tool to address the diverse needs of the special access marketplace.

JCIG's response: JCIG represents the diverse special access marketplace. Members of JCIG include end users, wireless carriers and competitive wireline carriers. All of the JCIG members agree that years of escalations and negotiations

have been wholly ineffective in improving incumbent LEC special access performance. In addition, negotiation imposes disproportionate burdens on smaller customers that have fewer resources to devote to negotiations and considerably less leverage at the negotiating table than larger customers. Customers should be able to purchase service out of the incumbent LECs' tariffs and have some assurance of reasonable service.

Service providers with 90-95% of the market have no incentive to negotiate. Given the incumbent LECs' market shares, even the largest customers often have no alternative sources of special access services. Meaningful negotiations cannot occur when one party has all of the negotiating leverage.

BOCs' claim: The performance measurements and standards proposed by JCIG are burdensome, unrealistic, unachievable, overly complex, subject to manipulation, and unjustified.

JCIG's response: Adopting the JCIG proposal would simplify, not complicate, the current situation. Under JCIG's proposal all customers would be entitled to uniform reporting. Today, many customers do not receive reports at all. And even those customers that are able to obtain reporting must deal with different business rules and measurements on a state-by-state, incumbent-LEC-by-incumbent-LEC basis. Moreover, BellSouth is already reporting against JCIG metrics in Florida and Georgia.

BOCs' claim: BOCs currently report on key measures, both in the aggregate and for specific customers, including certain JCIG members.

JCIG's response: ARMIS reports are severely deficient in both quality and scope, as detailed above. The data available pursuant to section 272 also suffer from several flaws. For example: there is no uniformity of reporting; there are no well-defined business rules; the sample sizes for incumbent LEC affiliates are very small; and the data is not timely – reports are biennial, releases are often delayed by months, and subject to disputes about confidentiality. In addition, while some JCIG members are able to obtain monthly performance reports, many members do not, and this discrepancy exists even between customers served by the same incumbent LEC. Moreover, many of the reports that JCIG members receive fail to provide sufficient information to allow customers to analyze key indicators with respect to performance and may not reveal discriminatory treatment.

BOCs' claim: Self-effectuating penalties, fines and forfeitures are unlawful.

JCIG's response: JCIG has not proposed self-effectuating penalties, fines or forfeitures. The forfeiture and complaint processes proposed by JCIG provide opportunities for the incumbent LECs to respond to any complaints or Notices of Apparent Liability. JCIG has also proposed that incumbent LEC tariffs and

contracts include service credits. As the BOCs have noted, service credits are incorporated in some BOC tariffs today. These service credits are far from uniform, however, and generally are far too small to provide sufficient incentives to drive incumbent LECs to improve special access performance.

BOCs' claim: This proceeding should be closed without any further action.

JCIG's response: JCIG's proposal for measurements, standards and reporting is backed by end users, wireless carriers, competitive LECs and long distance companies – in short, everyone but the incumbent LECs. The market for interstate special access is not competitive. JCIG's proposal is designed to achieve results similar to what could reasonably be expected in a competitive market. Adoption of the JCIG proposal is essential to ensuring that JCIG members, such as CMRS providers, can offer services in competition with incumbent LECs. The JCIG proposal would benefit end users by ensuring that they can receive high-quality special access services on a timely basis from a wide range of carriers.

Tab 9

LAWLER, METZGER & MILKMAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

GIL M. STROBEL
PHONE (202) 777-7728

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

June 28, 2004

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Presentation*
Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321
Non-Accounting Safeguards of Sections 271 and 272, CC Docket No. 96-149
Accounting Safeguards under the Telecommunications Act, CC Docket No. 96-150
Section 272(f)(1) Sunset of BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112
BellSouth Section 272 Audit, EB Docket No. 03-197
Qwest Section 272 Audit, EB Docket No. 03-198
SBC Section 272 Audit, EB Docket No. 03-199
Verizon Section 272 Audit, EB Docket No. 03-200

Dear Ms. Dortch:

On June 28, 2004, members of the Joint Competitive Industry Group ("JCIG") provided the attached written *ex parte* presentation to William Maher, Chief, Wireline Competition Bureau.

In accordance with the Commission's rules, a copy is being provided to you for inclusion in the public record of the above-referenced proceedings.

Sincerely,

Gil M. Strobel

Attachment

cc: Scott Bergmann
Jeffrey Carlisle
Christopher Libertelli
Barry Ohlson
Julie Veach
Matthew Brill
Samuel Feder
Jennifer Manner
Jessica Rosenworcel
Sheryl Wilkerson
Michelle Carey
Brad Koerner
Paul Margie
Robert Tanner

June 28, 2004

William Maher
Chief, Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Analysis of BOC Special Access Performance Proposals

Dear Mr. Maher:

BellSouth, SBC, Qwest, and Verizon each have filed proposed special access performance measures[1] that they contend the Commission should adopt in lieu of the proposal that the Joint Competitive Industry Group ("JCIG") filed in January 2002.[2] These four Bell Operating Companies ("BOCs") are collectively the dominant providers

[1] Letter from Kathleen B. Levitz, BellSouth, to Marlene H. Dortch, FCC, CC Docket Nos. 96-149 and 01-321 and WC Docket Nos. 02-112 and 03-197 (April 29, 2004), and attached *ex parte* presentation entitled "BellSouth's Harmonized Section 272(e)(1) Performance Measurements Proposal" ("BellSouth April 29, 2004 Presentation") and proposal entitled "Harmonized Performance Metrics Proposal" ("BellSouth April 29, 2004 Proposal"); letter from Brett A. Kissel, SBC, to Marlene H. Dortch, FCC, CC Docket No. 01-321 and WC Docket No. 02-112 (dated May 27, 2004; filed June 1, 2004), and attached *ex parte* presentation entitled "Performance Measures After §272 Sunsets" ("SBC May 27, 2004 Presentation") and proposal entitled "272(e)(1) Information Disclosures" ("SBC May 27, 2004 Proposal"); letter from Cronan O'Connell, Qwest, to Marlene H. Dortch, FCC, CC Docket Nos. 96-149 and 01-321, WC Docket No. 02-112 and EB Docket No. 03-197 (May 20, 2004), and attached *ex parte* presentation entitled "Assessment of BellSouth Proposal" (Qwest May 20, 2004 Presentation") and proposal entitled "Service Performance Measurement Descriptions (SPMD); 14-State 272 SPMD Version 2.10" ("Qwest May 20, 2004 Proposal"); letter from Tyrone Keys, Jr., Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (June 16, 2004) ("Verizon June 16, 2004 *ex parte*"). In addition, Verizon has filed a presentation outlining principles that it believes should inform any special access measures. *Ex parte* presentation attached to letter from Tyrone Keys, Verizon, to Marlene H. Dortch, FCC, WC Docket Nos. 01-321 and 02-112 (May 17, 2004) ("Verizon May 17, 2004 Presentation").

[2] "Joint Competitive Industry Group Proposal; ILEC Performance Measurements & Standards in the Ordering, Provisioning, and Maintenance & Repair of Special Access Service" (Jan. 18, 2002), Attachment A to letter from A. Richard Metzger, Jr. to Chairman Powell, FCC, CC Docket No. 01-321 (Jan. 22, 2002) ("JCIG Proposal").

of special access services. JCIG, by contrast, is comprised of the full spectrum of special access customers: large corporate end users, CMRS carriers, inter-exchange carriers and competitive local exchange carriers ("LECs").[3] From this customer-oriented perspective, JCIG is united in its position that all of the BOCs' proposals suffer from critical flaws that make them unsuitable alternatives to JCIG's long-standing proposal.

The proposals offered by the BOCs exclude several key measurements, and the few measures they do offer omit information that customers and regulators need if they are to evaluate the BOCs' performance accurately. Indeed, BellSouth's proposal represents a retreat from the metrics it filed in August 2002 as part of its agreement with Time Warner Telecom ("TWTC"),[4] and is even a step back from the proposed measures that BellSouth filed as recently as November 2003.[5] BellSouth's proposal is also significantly less comprehensive than the reporting it currently provides in several states pursuant to state commission orders adopting the JCIG measures, including the two largest states in the BellSouth region – Florida and Georgia.

In the discussion below, JCIG offers a general analysis of the BOCs' proposals, focusing on the overarching issues that are common to all of the proposals, followed by a metric-by-metric analysis of the various proposals. JCIG also includes a brief response to Verizon's attempts to dispute the importance of statistical tests in determining the existence of discriminatory behavior. Briefly stated, JCIG's analysis plainly shows that the BOCs' proposals would not: (1) establish an effective mechanism for the systematic measurement and reporting of their performance in ordering, provisioning, maintaining and repairing special access service; (2) improve the quality, timeliness or reliability of BOCs' special access performance; or (3) ensure nondiscriminatory performance of the basic, recurring tasks associated with providing special access. All of the proposals are so fundamentally flawed that none of them can be used even as a starting point for

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[3] The Joint Competitive Industry Group is composed of competitive local exchange carriers, long distance carriers, CMRS providers, and end user customers, all of whom support a unified set of measures, standards, and reporting requirements, as well as an enforcement plan designed to improve incumbent LECs' performance regarding interstate special access services. JCIG's membership includes: The American Petroleum Institute (API), the Association for Local Telecommunications Services (ALTS), the Competitive Telecommunications Association (CompTel), the eCommerce & Telecommunications Users Group (eTUG), AT&T, British Telecom North America, Focal Communications Corporation, Global Crossing, Ltd., MCI, NewSouth Communications, Nextel Communications, Inc., T-Mobile USA, Inc., and XO Communications, Inc.

[4] *Ex parte* presentation attached to letter from William W. Jordan, BellSouth, to Marlene H. Dortch, FCC, CC Docket Nos. 01-321 and 01-338 (August 26, 2002) ("BellSouth/ TWTC Aug. 26, 2002 Proposal").

[5] "BellSouth Service Quality Measurement Plan," attached to letter from Kathleen B. Levitz, BellSouth, to Marlene H. Dortch, FCC, CC Docket Nos. 00-175 and 01-321 and WC Docket No. 02-112 (Nov. 14, 2003) ("BellSouth Nov. 14, 2003 Proposal").

developing a meaningful and effective measurement, reporting, and enforcement regime applicable to the BOCs' special access performance.

General Points

Performance plans generally have four components: measurements, standards, reporting and enforcement. This letter focuses on the measurements proposed by the BOCs, because measurements are the foundation of any proposal. It is impossible to build an effective performance plan on the basis of measurements that are inherently flawed (*e.g.*, fail to capture key information). Before turning to the measures themselves, however, it is worth reviewing briefly the substantial defects in the BOCs' proposals with respect to standards, reporting and enforcement.

Standards

- None of the BOC proposals establish meaningful standards.[6] Objective standards are needed to ensure that all customers, including retail end users, are provided special access services in a just and reasonable manner, as required by section 201 of the Communications Act.[7] Parity standards do not ensure adequate performance. At best, parity standards ensure only that BOC retail customers and wholesale competitors receive the same performance, even if that performance is completely unacceptable.[8]

Reporting

- None of the BOC proposals would produce reporting data that are meaningfully disaggregated.[9] Disaggregated reporting is necessary if customers and regulators are to identify unreasonably discriminatory treatment that violates the Act.[10] To

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[6] All four BOCs reject the use of objective benchmark standards and propose that the Commission adopt some form of parity standard. *See, e.g.*, BellSouth April 29, 2004 Proposal at 3-5; Qwest May 20, 2004 Presentation at 2; SBC May 27, 2004 Proposal at 7; Verizon June 16, 2004 *ex parte*, Att. C, at 1, 3, 5.

[7] *See* 47 U.S.C. § 201(b).

[8] In addition to the policy imperatives that militate against relying solely on parity standards, there also are pragmatic issues that limit the utility of parity standards, and may even make parity standards unworkable for some measures. For example, low volumes of orders may make it difficult to make meaningful "parity" comparisons for many metrics. There are also measures for which no retail analogues exist.

[9] See BellSouth April 29, 2004 Proposal at 2 and SBC May 27, 2004 Presentation at 13 (both proposing to report on an aggregated basis for three categories: Section 272 affiliates; BOC and other affiliates; and non-affiliates); Qwest May 20, 2004 Proposal at 3-9 (proposing to report on "QLDC and QCC aggregate and IXC Non-Affiliates results); Verizon May 17, 2004 Presentation at 5 (proposing to report aggregate results for affiliates and IXCs).

[10] *See* 47 U.S.C. § 202(a).

facilitate the detection of such unlawful practices, each BOC should be required to provide performance reports on a customer-specific basis to all its special access customers and to file public reports with the FCC on an aggregated basis for the following groups of customers: unaffiliated CMRS providers; affiliated CMRS providers; competitive wireline providers; affiliated wireline providers; and BOC end-user customers. The filings BellSouth has made in compliance with state orders adopting the JCIG metrics have put to rest any doubts about the BOCs' ability to collect the performance information sought by JCIG in this proceeding.[11]

- Some of the BOCs' proposals also fail to provide for timely reporting. Verizon, for example, proposes that the BOCs report their special access performance once a year, with results through December 31 of the prior year being reported on April 1st of the following year.[12] SBC proposes to provide reports on a quarterly basis.[13] To be useful, reporting must be provided on a monthly basis, and must not lag too far behind the performance being measured.[14] Special access customers need up-to-date information on the service they are being provided. Frequent, timely performance reports are essential to enable special access customers to identify and correct recurring shortcomings in the BOCs' provision of special access service. There is an inherent delay between any report of poor performance as well as the identification of any performance activities and the resolution of any enforcement action based on that performance. It is imperative that this delay not be exacerbated by untimely reporting.

Enforcement

- None of the BOC proposals provide for the correction of demonstrably unacceptable performance.[15] Effective enforcement mechanisms are needed to provide the BOCs with the proper incentives to offer their customers adequate service. Enforcement mechanisms must lead to timely and appropriate payments to carriers (service credits and/or damages) as well as forfeitures for sub-standard

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[11] *See, e.g.*, BellSouth Georgia Performance Measurement Reports for April 2004, attached to letter from Bennett L. Ross, BellSouth, to Reece McAlister, Georgia Public Service Commission, GA PSC Docket No. 7892-U (June 2, 2004).

[12] Verizon May 17, 2004 Presentation at 7; *see also* Verizon June 16, 2004 *ex parte*, Att. A at 1.

[13] *See* SBC May 27, 2004 Proposal at 2 (stating that "monthly data will be generated quarterly"). Qwest did not specify a reporting cycle in its proposal.

[14] *See* BellSouth April 29, 2004 Presentation at 4 (stating that under its plan, reporting would be available monthly).

[15] *See, e.g.*, SBC May 27, 2004 Presentation at 7-9 (arguing that the FCC cannot use a lack of parity in performance measurement results to create a presumption of discrimination, even where the BOCs' own measurements show chronic out-of-parity situations).

or unreasonably discriminatory performance. The enforcement process must be swift and reliable and the payments and forfeitures must be sufficient to deter the BOCs from engaging in conduct that is unjust, unreasonable or unreasonably discriminatory. Otherwise, the BOC will consider the risk of penalties as simply a cost of doing business.

Measurements

While all of these components are vital to ensuring that the BOCs' special access performance is just, reasonable and not unreasonably discriminatory, the foundation upon which any plan for improving BOC special access performance rests is the measurements themselves. The reporting requirements, performance standards, and even enforcement provisions, are only as good as the measurements on which they are based. The measurements proposed by BellSouth and the other BOCs clearly fail to capture the data needed for an effective performance assurance plan.[16] Among their more obvious shortcomings, the BOCs' proposals fail to capture performance failures and other important data and fail to establish clear and meaningful business rules.

Exclusion of performance failures and other important measures. The measurements proposed by the BOCs focus only on the "good news," *i.e.,* those instances in which a BOC's performance meets expectations. The BOCs do not propose to track what happens after a measurement is missed, however. For example, the BOCs' proposals provide no information regarding Access Service Requests ("ASRs")[17] for which no Firm Order Confirmation ("FOC")[18] is returned, and no information regarding installation appointments that are missed. In addition, the measurements proposed by the BOCs provide no incentive for the incumbent LECs to return a FOC once a FOC due date has been missed, or to provision an order quickly once an installation appointment has been missed.

The BOC proposals do not capture certain critical information, failing to measure information such as: what happens to FOCs that are not returned on time (captured in JCIG's JIP-SA-2, FOC Receipt Past Due); the quality of the response to a FOC request

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[16] For ease of discussion, this analysis is organized around the BellSouth proposal filed April 29, 2004. JCIG also provides comments on the Qwest, SBC and Verizon proposals to the extent that they differ materially from BellSouth's proposal.

[17] Carriers and some large end users place an order for special access service with an incumbent LEC by submitting an ASR. The ASR is an industry form used to transmit detailed ordering information including: end-user customer premises address; billing name and billing address; technical specifications for the service requested; the requested due date; and the names and telephone numbers of relevant contacts.

[18] The FOC is an electronic transmission sent by the incumbent LEC in response to an ASR. Among other things, the FOC contains the due date specified by the BOC for the installation of requested facilities (the FOC Due Date). Competitive carriers rely on the FOC Due Date to notify their own end-user customers of the date on which the facilities will be installed and services will be turned up.

(captured in JCIG's JIP-SA-3, Offered vs. Requested Due Date); the length of time it takes to install service after a due date is missed (captured in JCIG's JIP-SA-5, Days Late); the number of circuits for which the due date has passed, but which still have not been installed (captured in JCIG's JIP-SA-7, Past Due Circuits); and the magnitude of chronic failures (captured in JCIG's JIP-SA-11, Repeat Trouble Report Rate). Without these measurements, it will be nearly impossible to gauge the BOCs' performance accurately.[19]

Lack of clear and meaningful business rules. The BOCs' proposals lack clear and meaningful business rules. For example, BellSouth's proposal excludes items such "carrier caused or end user misses" (*i.e.*, "CNRs") from certain calculations, but offers an open-ended definition that is subject to interpretation,[20] and provides no means of tracking CNRs. BellSouth claims that there is no need to track CNRs because "customer/end-user behavior provides no basis for assessing BellSouth's performance."[21] As the ARMIS reports filed by BellSouth and the other BOCs demonstrate, however, there is a need to ensure that all the BOCs are subject to uniform measurements and to business rules designed to capture the data that is most important to customers and regulators. Otherwise, the resulting reports will be meaningless or even misleading.

BellSouth's 2003 ARMIS results show 100% installation commitments met for switched access and 99.8% installation commitments met for special access.[22] BellSouth also reports that nearly 12% of all switched access commitments and more than 10% of all special access installation commitments were "missed for customer reasons." BellSouth thus claims that it was not responsible for any missed switched access appointments and was responsible for missing only 232 special access installations. On the other hand, according to BellSouth, customers were responsible for over 56,000

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[19] Verizon originally proposed that the BOCs report on only three measures, none of which it defined in any detail. Verizon May 17, 2004 Presentation at 7. Clearly, such limited reporting would provide no material benefit to BOC customers or to regulators. Verizon seems to have reconsidered its position slightly, filing a draft proposal that includes five special access measures. *See* Verizon June 16, 2004 *ex parte*.

[20] Although BellSouth's definition appears to resemble JCIG's definition of customer not ready ("CNR") situations, the critical difference is that under JCIG's definition a missed appointment can be counted as a CNR only if the incumbent LEC has notified the ordering carrier of a CNR situation and allowed the carrier a reasonable period of time to correct the situation. *See* JCIG Proposal at 7, JIP-SA-4. This requirement constrains the BOC's ability to evade culpability for a missed installation appointment by improperly blaming the end user or requesting carrier for the BOC's failure to fulfill its obligations.

[21] *Ex parte* presentation attached to letter from Kathleen B. Levitz, BellSouth, to Marlene Dortch, FCC, CC Docket No. 01-321, at 13 (June 9, 2004) ("BellSouth June 9, 2004 Presentation").

[22] *See* BellSouth's ARMIS Paper Report 43-05, Service Quality Report (2003), *available at*: <http://svartifoss2.fcc.gov/eafs/paper/43-05/PaperReport05.cfm> ("BellSouth's ARMIS Report").

missed appointments for switched access installation and over 12,000 missed appointments for special access installations.[23]

Verizon similarly reported that 60% (2,799 out of 4,694) of all switched access installation intervals were missed for customer reasons, compared to only 1.2% that were missed due to Verizon.[24] Verizon further admits that it was responsible for missing roughly 13,800[25] special access installation intervals, but claims that customers were at fault for an additional 22,300 missed installation intervals.[26] This type of reporting demonstrates the importance of having meaningful definitions of key terms and for tracking both the BOCs' performance and their claims regarding the impact of customer or end user behavior on performance.

Equally problematic are the BOCs' assertions that each reporting carrier should be permitted to devise its own company-specific business rules.[27] Verizon even goes so far as to claim that company-specific business rules will lead to "more comparable and meaningful data."[28] Nothing could be further from the truth. Without uniform business rules, it will be impossible to compare performance by individual BOCs and identify best practices that the FCC can use to determine whether BOCs' special access performance is satisfactory. The ARMIS reports noted above provide an instructive example of the type of meaningless reporting that would result if the BOCs are allowed to define their own business rules. As AT&T noted in a recent filing, the BOCs' past actions demonstrate the risks inherent in allowing the BOCs to define their own metrics and adopt their own business rules.[29] In addition, many customers order service from multiple BOCs, and need to have the ability to measure BOC performance consistently across multiple territories.

Finally, although BellSouth has now committed to a data retention policy,[30] the other BOCs do not propose to provide special access customers with any of the data

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[23] *See* BellSouth's ARMIS Report, Rows 110-112, columns aa-ac.

[24] *See* Verizon's ARMIS Paper Report 43-05, Service Quality Report (2003), rows 110-114, columns aa-ac ("Verizon's 2003 ARMIS Report").

[25] 155,775 total orders minus 141,973 (155,775 x 91.14% commitments met).

[26] *See* Verizon's 2003 ARMIS Report.

[27] *See* Verizon May 17, 2004 Presentation at 2, 6; Qwest May 20, 2004 Presentation at 2 (proposing "individual RBOC standards"); SBC May 27, 2004 Presentation at 2, 5 (arguing that BOCs should be allowed to establish "company-specific business rules").

[28] Verizon May 17, 2004 Presentation at 6.

[29] *See* letter from Aryeh Friedman, AT&T, to Marlene Dortch, FCC, WC Docket Nos. 02-112, *et al.*, at 4 (June 7, 2004) ("Friedman Letter") (describing Verizon's abuses of the of the section 272 biennial audit process).

[30] BellSouth June 9, 2004 Presentation at 13.

underlying their reports. For the measurements to have any credibility, it is essential that the underlying data be subject to collection and auditing.[31]

Metric-by-Metric Analysis

Ordering

Unanswered ASRs. BellSouth proposes a single measure to capture ordering performance – FOCT2, Firm Order Confirmation Timeliness.[32] As JCIG has explained in previous filings, however, a single measure cannot provide a complete assessment of the BOCs' performance regarding the ordering process.[33] Among other problems, the FOCT2 measure calculates performance only for those ASRs for which a FOC is provided, and does not track ASRs to which the BOC does not respond in the month covered by the BOC's report. Although the FOCT2 measure includes a diagnostic showing the percentage of requests received and due during the reporting that were responded to, it provides no information regarding those ASRs for which no response was provided. Thus, it is possible that open ASRs to which the BOC has not responded will accumulate from month to month and that there will be no means of measuring or tracking the backlog. Tracking ASRs for which no FOC has been provided would also increase the BOCs' incentive to return FOCs even after they are past due. These are precisely the concerns that JCIG's proposed measure JIP-SA-2 (FOC Receipt Past Due) was designed to address.[34]

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[31] *See* Friedman Letter at 4-5 (explaining that without access to the underlying data there was no way to evaluate whether Verizon had reported its section 272 performance results accurately or whether the data was indicative of Verizon's overall performance).

[32] Although BellSouth proposes to measure performance related to both switched and special access, JCIG's comments are limited solely to the special access measurements. *See* BellSouth April 29, 2004 Proposal at 3. *See also,* Qwest May 20, 2004 Proposal at 4 (PO-5-272 – Firm Order Confirmations On Time) (proposing to report on performance for Feature Group D orders).

[33] *See, e.g.*, "Joint Competitive Industry Group; Origin of Metrics," Attachment A to letter from JCIG to Dorothy Attwood, attached to letter from Ruth Milkman to Marlene H. Dortch, FCC, CC Docket No. 01-321, at 1-4 (June 18, 2002) ("Origin of Metrics"); *ex parte* presentation attached to letter from Gil M. Strobel to Marlene H. Dortch, FCC, CC Docket No. 01-321, at 6-8 (June 23, 2003).

[34] BellSouth has expressed concern that it would be duplicative to measure both the number of FOCs that were returned on time and the number that are past due. However, it is important both to capture those cases where FOCs are returned and determine whether they were returned in a timely manner, and to track instances in which a FOC has not been returned, and provide an incentive for the BOC to ensure that unanswered ASRs do not accumulate. JIP-SA-2 is designed to show the magnitude of late FOCs by comparing the cumulative number of open ASRs, from current and past months that are not in a rejected or queried status, to the volume of ASRs sent during the reporting

Quality of the ordering process. BellSouth's proposed FOCT2 also fails to provide any information regarding the quality of the ordering process or the due date offered by the BOC. Specifically, BellSouth's proposal does not provide information on how the installation date offered by the BOC compares to the date requested by the special access customer. Consequently, a BOC could respond to an ASR with a FOC that includes any installation date the BOC chooses, and ignore the date requested on the ASR. The differences between offered and requested installation dates are important to customers and to assessing whether special access services are being provisioned in a commercially reasonable manner. This issue could be addressed if the BOCs measured offered versus commercially-requested due dates as JCIG proposed in its JIP-SA-3 measurement.

Projects. BellSouth's FOCT2 measure also excludes "projects," which are not well defined. This is problematic because there is no uniform definition of a project. Each BOC has formulated its own definition, and if the term is not clearly defined at the outset, it will be subject to manipulation by the BOCs. For example, a BOC could avoid reporting on poor performance regarding a particular order by re-defining the order as a "project." Therefore, it is important that any rules adopted by the FCC either include projects in the measurements,[35] or define projects in a manner that allows the measurements to be meaningful.

Facilities checks. Although BellSouth's November 2003 proposal included a commitment to conduct a facilities check before issuing a FOC,[36] its latest proposal includes no such commitment. Without a facilities check the BOC is more likely to issue a FOC due date that it cannot meet. For a FOC due date to have any meaning, it must be a "firm" date upon which the customer can rely.

Disconnect orders. BellSouth also includes "disconnect ASRs" (*i.e.*, ASRs requesting disconnection of an existing circuit) in its measurement under FOCT2. This inclusion is likely to boost the BOCs' performance as disconnect ASRs are very simple to fulfill and lack the complexity that sometimes causes delays in fulfilling installation requests. Because disconnections are much easier to perform than installations, inclusion of disconnect ASRs would produce a distorted picture of the BOCs' performance with

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period. If the BOC does not provide any information on unanswered ASRs it would be possible for backlogs to build up undetected, as the problem would never be identified in the FOCT2 measure. In addition, JIP-SA-2 specifically makes allowances for cases where the expected interval has not been exceeded at month end. For example, orders for a DS0 or DS1 are excluded from the FOC Receipt Past Due measurement if they were sent in the last 2 business days of the month. Similarly, an order for a DS3 is excluded from JIP-SA-2 if it was sent within the last 5 business days of the month.

[35] *See, e.g.*, JCIG Proposal at 4, JIP-SA-1.

[36] *See* BellSouth Nov. 14, 2003 Proposal at 2 (definition of SA-1: Firm Order Confirmation Timeliness).

respect to the aspect of the ordering process that is of interest to customers –installation orders. The measurements should therefore exclude disconnect ASRs.[37]

Qwest

Qwest also proposes to capture ordering performance through a single measure, PO-5-272, Firm Order Confirmations On Time. This measurement is similar to BellSouth's FOCT2 and suffers from many of the same flaws. In addition, Qwest excludes ASRs involving individual case basis handling from its measures, though, as Qwest notes, these same orders may be excluded as "projects" under the BellSouth proposal[38] and proposes a longer standard interval for DS0 and DS1 special access orders than either BellSouth or JCIG.[39]

SBC

SBC's proposed measurement, Service Category 3, Time to Firm Order Confirmation, suffers from all of the defects associated with the BellSouth and Qwest proposals. In addition, SBC fails to distinguish between special and switched access orders and offers no standard interval. Instead, SBC proposes to provide a single measurement, reporting the interval within which 95% of its FOCs have been returned.

Verizon

Verizon's proposed measurement Firm Order Confirmation Timeliness, is very similar to BellSouth's, but provides for longer intervals than BellSouth's proposal.[40]

Provisioning

Business rules. BellSouth proposes two measures related to provisioning: PIAM2, Percent Installation Appointments Met; and NITR2, New Installation Trouble Report Rate.[41] PIAM2 is intended to measure the BOC's timeliness in meeting its own confirmed installation due dates, *i.e.*, whether the service is installed on the date to which the BOC committed in its FOC. However, the measurement as proposed by BellSouth is susceptible to manipulation due to its exclusion of "carrier caused or end user misses,"

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[37] BellSouth seems to recognize the problems associated with counting disconnect orders, as its provisioning measure, PIAM2, excludes such orders. BellSouth April 29, 2004 Presentation at 4.

[38] *See* Qwest May 20, 2004 Presentation at 5.

[39] *Compare* Qwest May 20, 2004 Proposal at 4 (FOC interval of 3 business days for DS0, DS1, DS3 and higher) with BellSouth April 29, 2004 Proposal at 3 (standard interval of 2 business days for DS0 and DS1; but 5 business days for DS3).

[40] Verizon proposes interval categories of 5 and 7 business days, which are unreasonably long, versus the 2 or 5 business days proposed by BellSouth. *See* Verizon June 16, 2004 *ex parte*, Att. C at 1.

[41] BellSouth also proposes to measure Average PIC Change Interval (PIC2), but JCIG offers no view on this measure as it relates only to switched access.

particularly given BellSouth's open-ended definition of these misses[42] and its unwillingness to report on the number of installations affected by such misses. As explained above, the BOCs have used similarly ill-defined exclusions to ensure that virtually all missed installation appointments are categorized as carrier-caused or end user misses. The results of such tactics are clear from ARMIS data purporting to show that the BOCs have nearly 100% on-time performance, while thousands of installation dates are missed for reasons that are ostensibly unrelated to the BOC's performance.[43]

Missing measurements. In addition, the BellSouth proposal does not provide any information regarding other important installation-related measurements, such as: (1) the time required for the BOC to complete the installation after the due date has been missed (*i.e.*, how many days late, or whether installation was ever completed for circuits not provisioned by the committed due date);[44] (2) the time required for the BOC to install service compared to the interval requested by the customer or offered by the BOC;[45] or (3) the number of circuits for which the installation date has passed and the work has not been completed.[46] All three of these measures provide data that are essential to assessing the BOCs' provisioning performance. The absence of any one of these measurements severely limits the value of BellSouth's proposal. Without any means of tracking what happens to orders once the initial installation date has been missed, the data will provide at best an inaccurate, and at worst a completely misleading, picture of BOC performance.[47]

Capturing all relevant troubles. BellSouth inexplicably limits its New Installation Trouble Report Rate measure (NITR2) to the first report of customer trouble that occurs within 5 days of installation of a new circuit. As explained below, BellSouth's proposed measure would exclude precisely the information needed to assess its provisioning performance. Among other problems, BellSouth's proposal would: (a) limit the reporting period to 5 days, as opposed to the typical 30-day period;

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[42] *See* note 20, *supra*.

[43] *See* discussion at 6-7, *supra*.

[44] *See* JCIG JIP-SA-5, Days Late.

[45] *See* JCIG JIP-SA-6, Average Intervals – Requested/Offered/Installation.

[46] *See* JCIG JIP-SA-7, Past Due Circuits.

[47] Both BellSouth and Qwest previously filed letters supporting three separate measures for On Time Performance to FOC Due Date, Days Late; and Past Due Circuits similar to JCIG's proposed JIP-SA-4, JIP-SA-5 and JIP-SA-7 measures. *See* Bell South/TWTC Aug. 26, 2002 Proposal and "Qwest *Ex Parte*, Special Access Performance Measurements," attached to letter from John W. Kure, Qwest, to Marlene H. Dortch, CC Docket No. 01-321 (Aug. 8, 2002) ("Qwest Aug. 8, 2002 *ex parte*") (both providing for three separate measures and supporting the calculation of on time performance and days late based on circuits completed during the reporting period, with the Past Due Circuits captured in a month end snapshot). It is unclear why either carrier has retreated from these prior positions.

(b) exclude second and subsequent trouble reports, masking the severity of the BOC's problems; and (c) exclude troubles "outside of BellSouth's control," which would lead to same distorted view of BOC performance that ARMIS data present.

The accepted norm is to report on all troubles that occur within 30 days of installation.[48] The arbitrarily short period covered by this measure, along with the weak business rules proposed by BellSouth, makes the measure meaningless.[49] The point of measuring new installation troubles is to provide a basis for assessing the quality of the BOC's installation performance. Counting only a single occurrence of a problem, even if it persists and results in multiple trouble reports, and limiting coverage to the first five days after installation deprives customers and regulators of the ability to make a realistic assessment of the BOC's performance.[50] An end-user customer expects service to function properly for more than the first five days after installation and the true level of customer irritation can be determined only by counting all troubles that occur within the first month of service.[51]

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[48] For example, the 30-day period proposed by JCIG is used by the New York Public Service Commission and was also included in a proposal that SBC filed with the California Public Utilities Commission. *See Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance by Verizon New York Inc.*, NY PSC Case Nos. 00-C-2051 & 92-C-0665, Order Denying Petitions for Rehearing and Clarifying Applicability of Special Services Guidelines at Appendix 3 (Dec. 20, 2001) ("NY PSC Guidelines"); "Special Access, Intrastate Business Rules, California," Attachment 1 to SBC California's (U 1001 C) Opening Comments on Intrastate Special Access Performance Measures, Cal. PUC Docket Nos. R. 97-10-016 & I. 97-10-017 (Aug. 29, 2003), both attached in pertinent part to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (Oct. 15, 2003). BellSouth's proposed five-day period is unsupported by any evidence in the record and would exclude many troubles that should be captured in any meaningful measurement of new installation trouble reports.

[49] For example, BellSouth states that it will count only "the first customer direct trouble report received within 5 days of a completed service order." BellSouth April 29, 2004 Proposal at 5. In addition, BellSouth proposes to exclude troubles "outside of BellSouth's control" from its measurements. *Id.* As noted above, such vague exclusions are open to interpretation and can lead to extremely skewed results depending on what the BOC determines to be "outside of its control."

[50] *See* letter from JCIG to Michelle Carey, FCC, attached to letter from Gil M. Strobel to Marlene H. Dortch, FCC, CC Docket No. 01-321, at 2-3 (Oct. 27, 2003) ("JCIG Oct. 27, 2003 *ex parte*").

[51] Because customers receive such uncertain due dates on the delivery of circuits, they frequently will not schedule equipment installation until after the circuit is in place. Therefore, they may not even have the ability to know that the circuit is not working until after the 5 day period proposed by BellSouth has ended.

By omitting repeat troubles from its measure, BellSouth is removing a significant set of data that is essential to measuring installation quality and new circuit quality. For example, if repeat troubles were excluded, a BOC that installed 1,000 new circuits, 10 of which generated 3 troubles each, would appear to be performing just as well as a BOC that installed 1,000 new circuits, 10 of which generated a single trouble. However, the actual customer impact would be very different under the two scenarios, as the harm to the end-user customer, and hence to the ordering carrier's reputation, would be much greater in the first instance, in which each circuit experienced multiple troubles, than in the second instance, in which each circuit generated only a single trouble.

Whether repeat troubles are caused by the recurrence of a single problem or are completely unrelated to each other, the total number of troubles is an important indicator of the quality of the new circuit. In fact, a large number of troubles on newly-installed circuits may indicate problems with the quality of the BOC's installation work or defects in the circuit itself. It also may signal that the BOC is sacrificing work quality in an attempt to satisfy other standards, such as on-time performance. Because of the limitations BellSouth has imposed on NITR2, its proposed measure fails to track the end-user's experience, which is the only meaningful gauge of a carrier's performance. Any measure that does not capture the total number of trouble reports created within the first 30 days of service would produce incomplete and potentially misleading results.

Qwest

Qwest proposes two provisioning measures: OP-3-272, Installation Commitments Met and OP-4-272, Installation Interval. OP-3-272 is comparable to BellSouth's proposed PIAM-2, with one slight difference: Qwest excludes installation appointments that were missed due to "non-Qwest reasons" from its measurement, rather than counting them as met appointments.[52] Qwest also proposes to measure the average installation interval, which could provide useful data similar to that captured by JCIG's proposed diagnostic measure JIP-SA-6, Average Intervals – Requested/Offered/ Installation. However, Qwest's proposal does not include any distinct measurement of new installation troubles, comparable to BellSouth's NITR2 or JCIG's JIP-SA-8.[53] As explained above, it is critical that the BOCs measure and report on new installation troubles separately from other troubles.[54]

SBC

SBC proposes to measure the percentage of orders completed on or before the due date desired by the customer (Service Category 1) as well as the number of days from the FOC due date in which 95% of orders are in service (Service Category 2). Unlike Qwest,

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[52] *See* Qwest May 20, 2004 Proposal at 5 (OP-3-272).

[53] In its presentation, Qwest states that it currently measures new installation troubles within thirty days of installation, Qwest May 20, 2004 Presentation at 6, but its proposal does not appear to include a measurement for new installation trouble report rate.

[54] *See* JCIG Oct. 27, 2003 *ex parte* at 1-4 (explaining the importance of measuring new installation troubles).

SBC proposes to identify installation appointments that are missed due to "customer reasons" as met appointments.[55] SBC's proposal has the advantage of capturing some data regarding the BOC's performance relative to the customer's desired due date as well as performance relative to the FOC due date. However, SBC's measurements would not provide sufficient insight into whether poor performance under Service Category 1 was due to the BOC's failure to match the offered due date with the customer's requested due date or whether the problem was the BOC's inability to meet the FOC due date. From the perspective of a competitive carrier, this distinction is important because a BOC's failure to meet the FOC due date to which it committed is likely to be much more problematic for the carrier's relationship with its end-user customers than is a BOC's failure to match the FOC due date with the requested due date.[56] SBC also fails to provide a distinct measure addressing new installation troubles comparable to either BellSouth's proposed NITR2 or JCIG's JIP-SA-8.

Verizon

Verizon's proposed measurement, Installation On Time Performance, is comparable to BellSouth's proposed PIAM2,[57] but its New Circuit Failure Rate measure is superior to BellSouth's proposed NITR2 in at least two ways. First, Verizon's New Circuit Failure Rate measure comports with accepted norms by measuring troubles that occur within 30 days of order completion (compared to only 5 days for BellSouth's proposed NITR2).[58] Second, Verizon appears willing to report each repeat trouble as a separate event, since it proposes to measure "[a]ll customer reported troubles where the trouble was found in the Verizon network."[59] However, Verizon excludes No Trouble Found ("NTF") and Test OK ("TOK") from its proposed measure, thereby reducing the number of troubles likely to be included in its report. Both NTF and TOK situations should be included in failure rate reports.[60]

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[55] *See* SBC May 27, 2004 Proposal at 1, 3, 4.

[56] *See* Origin of Metrics at 3-6.

[57] Verizon June 16, 2004 *ex parte*, Att. C at 2. Although Verizon does not list "carrier caused or end-user misses" as an exclusion to its proposed measure, the Verizon proposal would still suffer from the fact that it proposes to count only BOC missed appointment codes in the numerator, essentially counting "customer caused" misses as met appointments. These misses should be counted in both the numerator and denominator. *See* JIP-SA-7. However, Verizon's proposed measure at least has the advantage of capturing information regarding "customer caused" misses. By excluding customer caused misses from its measure entirely, BellSouth deprives customers and regulators of access to any data related to such situations.

[58] Verizon June 16, 2004 *ex parte*, Att. C at 3.

[59] *Id.*

[60] *See* JCIG's proposed measurement JIP-SA-8, New Installation Trouble Report Rate (providing no exclusions for either NTF or TOK).

Maintenance and Repair

Troubles "outside BellSouth's control." BellSouth proposes two measures directed at maintenance and repair issues: CTRR2, Failure Rate/Trouble Report Rate and MAD2, Average Repair Interval. These are comparable to JCIG's proposed metrics JIP-SA-9, Failure Rate and JIP-SA-10, Mean Time To Restore. However, both CTRR2 and MAD2 suffer from vaguely worded exclusions. Specifically, both measurements exclude "troubles outside BellSouth's control." This exclusion is not defined, but presumably covers situations other than "customer caused troubles," which are the subject of a separate exclusion. The vagueness of the wording makes it difficult to predict all of the situations that might fall under the category of "troubles outside BellSouth's control." One possibility is that BellSouth might apply this exclusion to NTF and TOK situations, both of which should be included in calculations of trouble report rates and average repair intervals. What is clear is that the terms used in any exclusion must be better defined.

Repeat troubles. BellSouth fails to offer any measurement designed to assess repeat troubles.[61] BellSouth suggests that repeat troubles are covered by its proposed CTRR2 measure. That measure, however, fails to capture and isolate the magnitude of chronic problems. Measuring occurrences of repeat troubles provides a basis for assessing the overall repair quality provided by the BOC. Specifically, measuring the repeat trouble rate enables customers to identify problems with the BOC's repair processes that cause troubles to recur on circuits that supposedly have been repaired and restored by the BOC. Indeed, it is common industry practice to isolate and evaluate repair quality through the separate measurement of repeat trouble reports occurring within 30 days of the first reported trouble.[62]

Qwest

Qwest's MR-6-272, Mean Time to Restore and MR-8-272, Trouble Rate are comparable to BellSouth's MAD2 and CTTR2, respectively. Qwest's measures are better than BellSouth's maintenance repair measures in two ways, however. First, Qwest includes both Test OK and No Trouble Found (the equivalent of JCIG's Found OK) in its maintenance and repair metrics.[63] Second, Qwest also includes a separate measure

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[61] JCIG has defined "Repeat Trouble" as "[t]rouble that reoccurs on the same telephone number/circuit ID within 30 calendar days." JCIG Proposal at 15.

[62] *See* JCIG JIP-SA-11; *See also Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies,* Order Implementing Proposed Revisions to the Performance Assessment Plan, Fla. PSC Docket No. 000121A-TP, at 41 (Apr. 22, 2003), attached to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (May 13, 2003); *Performance Measures for Telecommunications Interconnection, Unbundling and Resale,* Order Adopting Changes to Performance Measures, Ga. PSC Docket No. 7892-U, at 5 (Nov. 14, 2002), attached to Letter from Gil Strobel to Marlene Dortch, FCC, CC Docket No. 01-321 (Dec. 18, 2002).

[63] *See* Qwest May 20, 2004 Presentation at 6. BellSouth excludes "troubles outside of BellSouth's control" from its measurements – a term which is not defined, but apparently

capturing the percentage of troubles cleared within four hours (MR-5-272) which may provide useful data, particularly if the timeframe is reduced to one or two hours as proposed by JCIG.[64] Like BellSouth, however, Qwest fails to propose a measurement aimed at identifying repeat troubles. This represents a retreat from an earlier Qwest proposal which included a measurement of repeat trouble reports.[65]

SBC

SBC's proposed Service Category 7 is comparable to BellSouth's MAD2. However, SBC excludes trouble reports coded TOK (Test OK) and FOK (Found OK) and excludes troubles on channelized circuits. SBC's Service Category 5 also excludes channelized circuits and reports coded as TOK or NTF (No Trouble Found). SBC's proposed measure does provide insight into the amount of time it takes SBC to clear most (95%) of its troubles. While this measurement may have some utility, it does not provide any information regarding the most serious outages, *i.e.*, the 5% not reflected in SBC's proposed measure. Like BellSouth and Qwest, SBC also fails to measure repeat troubles.

Verizon

Verizon's proposed Failure Frequency Rate and Mean Time to restore measurements are very similar to BellSouth's proposed CTRR2 and MAD2 measures.

Importance of Statistical Analysis

Verizon argues that statistical tests alone do not provide evidence of competitively significant discrimination.[66] In fact, statistical comparisons can provide very strong, if not conclusive, evidence of discrimination.[67] This is evident from the Declarations of Dr. Robert M. Bell, who submitted statistical analyses of all the section 272 audits.

Verizon argues that: (i) t-tests and modified Z tests depend on distributional assumptions that generally do not hold when there are small sample sizes, and (ii) the probability of one or more Type I errors (false positives) grows very large when there are tests for multiple measures or multiple months.[68] However, data aggregated over

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encompasses issues other than troubles caused by customer-provided equipment or other customer-caused troubles, both of which are covered by a separate exclusion.

[64] *See* JIP-SA-10, Mean Time To Restore (proposing that ILECs' restore lower-capacity circuits within two hours, and DS3 and higher capacity circuits within one hour).

[65] *See* Qwest Aug. 8, 2002 *ex parte* at 6 (Qwest SA-11, Repair Repeat Report Rate).

[66] Verizon June 16, 2004 *ex parte* at 2.

[67] *See, e.g., Castaneda v. Partida,* 430 U.S. 482 (1977) (using statistical data to prove discrimination in jury selection); *City of Tuscaloosa v. Harcros Chemicals, Inc.*, 158 F.3d 548 (11th Cir. 1998) (statistical data and expert testimony raised genuine issue of material fact as to whether chemical distributors engaged in price fixing conspiracy).

[68] Verizon June 16, 2004 *ex parte* at 3-4.

several months can provide much more conclusive evidence. For example, in analyzing the section 272 audits, Dr. Bell did not use a single month's data but rather combined data over longer periods and performed statistical inferences for the aggregate period. That procedure eliminated or greatly reduced both of the concerns raised by Verizon. So analyzed, the data in Verizon's and the other BOCs audits demonstrated statistically significant enduring and consistent patterns of poorer performance for non-affiliated carriers.[69]

Finally, Verizon argues that statistical tests are flawed if the populations of customers are non-comparable ("apples to oranges").[70] The short answer to this argument is that when, as in the case of the Verizon and other BOC section 272 audits, the statistical analyses produce strong evidence of poorer performance for non-affiliates, the burden should shift to the BOC to present evidence that provides legitimate and credible explanations for the poorer performance. Indeed, in the most recent audit, Verizon attempted to provide an explanation, although, as shown by Dr. Bell in his Declaration, "Verizon analyses [were] generally superficial and incomplete."[71]

Conclusion

Although JCIG has not endeavored to provide an exhaustive list of every flaw in the BOCs' proposals, the number and nature of the concerns discussed above are sufficient to demonstrate that none of these proposals would provide customers or

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[69] For example, the average Firm Order Confirmation Response Time ("FOC") intervals for non-affiliated carriers were consistently and materially longer than those for the 272 affiliate (in New York, for 21 of the 23 months where there were any affiliate orders, usually by a factor of three or greater; in Massachusetts, in each of the 12 months where there were affiliate orders). Declaration of Dr. Bell in the Second Verizon Audit, EB Docket No. 03-200, ¶¶ 6-7 (Feb. 10, 2004). The same was true for average installation intervals (in New York, non-affiliates received poorer service in 22 of 23 comparisons; in Massachusetts, the non-affiliate averages were longer in 7 of the 8 months where there were any affiliate orders), and average repair times (in New York, non-affiliates had longer repair times for DS1 service in 21 of 23 comparisons; in Massachusetts, non-affiliates had longer repair times for FG-D for 11 of 12 months in 2002 and the non-affiliates' average was more than twice that for section 272 affiliates). *Id.*, ¶¶ 8-9. As noted by Dr. Bell, had the raw data been provided, he could have performed permutation testing: "Nonetheless, comparisons of the non-affiliate/affiliate differences with the estimated standard errors for the individual averages makes it clear that none of the differences . . . were likely to have occurred by chance if installation/repair times for the two sets of customers were drawn from the same distribution." *Id.* ¶ 11. *See also*, Dr. Bell's Declaration in the second SBC audit, EB Docket No. 03-199, ¶¶ 13-26 (March 26, 2004); Dr. Bell's Declaration in the BellSouth audit, EB Docket No. 03-197, ¶¶ 5-13 (March 9, 2004).

[70] Verizon June 16, 2004 *ex parte* at 3.

[71] Declaration of Dr. Bell, EB Docket No. 03-200, ¶ 13; *see also id.* ¶¶ 12-17.

regulators the information they need to assess the BOCs' special access performance accurately. Accordingly, none of these proposals should be adopted for use by the FCC. Instead, BOC special access performance should be measured in accordance with the metrics JCIG proposed over two years ago. Unlike the unilateral proposals offered by the BOCs, the JCIG metrics were the product of a collaborative effort by multiple organizations and carry the support of a broad range of special access customers, including wireless carriers, interexchange carriers, local exchange carriers and end users. The FCC should therefore act on the commitment it made in its OI&M order[72] by adopting the JCIG metrics as expeditiously as possible.

Respectfully submitted,

The Joint Competitive Industry Group

[72] *Section 272(b)(1)'s "Operate Independently" Requirement for Section 272 Affiliates*, 19 FCC Rcd 5102, ¶ 24 (2004).

Tab 10

September 3, 2004

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Written Ex Parte Presentation*
In the Matter of Performance Measurements and Standards for Interstate Special Access Services
CC Docket No. 01-321

Dear Ms. Dortch:

In an effort to expedite the resolution of the Commission's special access metrics proceeding, the Joint Competitive Industry Group (JCIG) is submitting a revised proposal for measuring Tier 1 incumbent local exchange carriers' (LECs') performance in the ordering, provisioning, and maintenance and repair of special access services.[1] In the spirit of compromise, JCIG has attempted to find a middle ground between the proposal BellSouth filed in April of this year and the original JCIG proposal. Attached please find: (1) a copy of JCIG's revised measurement proposal (Attachment A); (2) a side-by-side comparison of the August 2004 JCIG and April 2004 BellSouth proposals (Attachment B); and (3) responses to certain arguments made by the Bell operating companies in various *ex parte* letters (Attachment C).

The revised JCIG metrics, like the original JCIG proposal, are the product of a collaborative effort by multiple companies and associations, and are supported by a broad range of special access customers, including wireless carriers, interexchange carriers, competitive local exchange carriers and end users. JCIG has modified its proposal to address concerns raised by the incumbent LECs. We urge the FCC to act expeditiously to resolve carriers' and end users' longstanding concerns with incumbent LEC special access performance by adopting the revised JCIG metrics as quickly as possible.

[1] *See* Attachment A.

In accordance with the Commission's rules, copies of these documents are being provided for you for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

Joint Competitive Industry Group

Attachments

cc: Scott Bergmann
Jeffrey Carlisle
Christopher Libertelli
Thomas Navin
Robert Tanner
Matthew Brill
Samuel Feder
Jennifer Manner
Barry Ohlson
Julie Veach
Michelle Carey
Brad Koerner
Paul Margie
Jessica Rosenworcel
Sheryl Wilkerson

ATTACHMENT A

Revised JCIG Proposal

Joint Competitive Industry Group Proposal

SERVICE QUALITY MEASUREMENT PLAN (SQM)

SPECIAL ACCESS SERVICE

Version 1.2

Issue Date : September 3, 2004

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Reporting Dimensions:

These Special Access Performance Metrics apply to the Special Access Service provided by the ILECs to CLECs, IXCs, Wireless Carriers, and Large End Users. The reporting definitions and business rules contained herein refer to these groups collectively as the "Customer."

Reports are required for:

Customer specific total, with the following reporting dimensions for all measurements.

- Special Access disaggregated by bandwidth
  Sub Totaled by State
  Totaled by ILEC

Comparison reports are required for:

- End-User Customer Aggregate
- ILEC Wireline Affiliates Aggregate
- Non-Affiliated Wireline Aggregate
- Affiliated CMRS Aggregate
- Non-Affiliated CMRS Aggregate

Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing ILEC end office switches.

Special access services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.

> **Exclusions:** Transmission path requests pursuant to an Interconnection Agreement for Unbundled Network Elements are excluded from these Performance Measures.

Reporting Period: The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to one decimal point.

Section 1: ORDERING

FOCT2: Firm Order Confirmation (FOC) Timeliness

Definition

Firm Order Confirmation (FOC) Timeliness measures the percentage of FOCs returned within the standard interval. A minimum of an electronic facilities check will be performed prior to the return of a FOC.

Exclusions

- Service requests canceled by the originator
- Unsolicited FOCs
- Administrative, test or record ASRs
- Disconnect ASRs

Business Rules

Counts are based on each instance of a FOC sent from the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is sent during the reporting period, is counted and measured. Days calculated are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day. Activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day. Service requests identified as projects are excluded from the Percent Within Standard Interval calculation, but are included as a diagnostic disaggregation under the Percent FOC Completeness and FOC Interval Distribution.

Calculation

Firm Order Confirmation (FOC) Interval = (a - b)

- a = Date and time FOC is returned
- b = Date and time valid Service Request (ASR) is Received

Percent within Standard Interval = (c / d) x 100

- c = Number of non-project service requests confirmed within the designated interval
- d = Total number of non-project service requests confirmed in the reporting period

Percent FOC Completeness = (d / e) x 100 - Diagnostic

- d = Total number of service requests for which a Firm Order Confirmation or Reject is sent during the reporting period
- e = Total number of service requests received where a FOC is due during the reporting period

FOC Interval Distribution = (a - b) - Diagnostic

- Count of FOC intervals distributed by days – 0, 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and > 10, for all service requests confirmed in the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Percent within Standard Interval

- DS0 (Percent within 2 business days) ..... => 98.0%
- DS1 (Percent within 2 business days) ..... => 98.0%
- DS3 (Percent within 5 business days) ..... => 98.0%
- OCn ..... (Individual Case Basis (ICB))

Percent FOC Completeness

Non Project - DS0 / DS1 / DS3 / OCn ..... - Diagnostic
Project - DS0 / DS1 / DS3 / OCn ..... - Diagnostic

FOC Interval Distribution

Non Project - DS0 / DS1 / DS3 / OCn ..... - Diagnostic
Project - DS0 / DS1 / DS3 / OCn ..... - Diagnostic

OVRD2: Offered Versus Requested Due Date

Definition

Offered Versus Requested Due Date measures the degree to which the Due Date provided on the FOC matches the Customer Requested Due Date (CRDD), also known as the Customer Desired Due Date (CDDD), when the Due Date Requested is equal to or greater than the ILEC specified standard interval.

Exclusions

- Service requests canceled by the originator
- Unsolicited FOCs
- Administrative, test or record ASRs
- Disconnect ASRs

Business Rules

Counts are based on each instance of a FOC returned by the ILEC. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is sent during the reporting period, is counted and measured. Days calculated are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day. Service requests identified as projects are included. Due dates for projects are normally negotiated prior to the ASR being sent. Standard Intervals are determined by each individual ILEC.

Calculation

Percent Offered Due Date equals CDDD = (a / b) x 100

- a = Number of FOCs returned in the reporting period with Due Date = CDDD where CDDD = > standard interval due date
- b = Number of FOCs returned in reporting period where CDDD = > standard interval due date

Offered vs CDDD Difference Distribution = (c - d) > 0 - Diagnostic

- c = FOC Due Date for service requests confirmed in reporting period where CDDD = > standard interval due date
- d = CDDD for service requests confirmed in reporting period where CDDD = > standard interval due date
- Count of difference > 0, distributed by days – 1-5 days, 6-10 days, 11-20 days, 21-30 days, and > 30 days

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Percent Offered Due Date equals CDDD

- DS0 ..... = 100.0%
- DS1 ..... = 100.0%
- DS3 ..... = 100.0%
- OCn ..... n/a

Offered vs CDDD Difference Distribution

- DS0 / DS1 / DS3/ OCn ..... - Diagnostic

Section 2: Provisioning

PIAM2: Percent Installation Appointments Met

Definition

Percent Installation Appointments Met measures the percentage of installation commitments completed on or before the current committed due date as recorded from the FOC received in response to the last ASR sent. Customer Not Ready (CNR) situations may result in an installation delay. The Percent Installation Appointments Met is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.

Exclusions

- Service requests issued and subsequently canceled by the originator
- Orders associated with administrative, testing or record activities
- Disconnect Orders
- Unsolicited FOCs

Business Rules

The measurement is calculated by dividing the number of service orders completed during the reporting period, on or before the FOC due date by the total number of orders completed during the same report period. The measurement is calculated both with and without CNR consideration. Measures are based on the last ASR received by the ILEC and the associated FOC Due Date returned. Selection is based on orders completed by the ILEC during the reporting period. The completion date is the date noted on a completion advice to the Customer. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.

Calculation

Percent Installation Appointments Met – With CNR Consideration = (a / b) x 100

- a = Number of orders completed on or before the FOC Due Date during the reporting period + Appointments missed due to CNR reasons
- b = Total number of orders completed during the reporting period

Percent Installation Appointments Met – Without CNR Consideration = (c / b) x 100 - Diagnostic

- c = Number of orders completed on or before the FOC Due Date during the reporting period
- b = Total number of orders completed during the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Percent Installation Appointments Met – With CNR Consideration

- DS0 ..... => 98.0%
- DS1 ..... => 98.0%
- DS3 ..... => 98.0%
- OCn ..... => 98.0%

Percent Installation Appointments Met – Without CNR Consideration

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

MADL2: Missed Appointments Average Days Late

Definition

Missed Appointments Average Days Late measure captures the magnitude of any delay, both in average and distribution, for those appointments not completed on or before the FOC Due Date where the missed appointment was not the result of a verifiable CNR situation. A breakdown of average days late for missed appointments caused by a lack of ILEC facilities is required for diagnostic purposes.

Exclusions

- Service requests issued and subsequently canceled by the originator
- Orders associated with administrative, testing or record activities
- Disconnect Orders
- Unsolicited FOCs

Business Rules

Measures are based on the last ASR received by the ILEC and the associated FOC Due Date returned. Selection is based on orders completed by the ILEC during the reporting period. The completion date is the date noted on a completion advice to the Customer. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.

Calculation

Missed Appointments Average Days Late = Sum (a - b)/ c

- a = Completion Date for missed appointments completed during the reporting period and missed for other than CNR reasons
- b = Appointment Date for missed appointments completed during the reporting period and missed for other than CNR reasons
- c = Total number of missed appointments completed during the reporting period and missed for other than CNR reasons

Missed Appointments Days Late Distribution = d - Diagnostic

- d = Days Late Interval (a - b) for missed appointments completed during the reporting period and missed for other than CNR reasons
- Days Late Interval distributed by days – 1 day, 2-5 days, 6-10 days, 11-20 days, 21-30 days, and > 30 days

Average Days Late Due to a Lack of ILEC Facilities = Sum (e - f) / g - Diagnostic

- e = Completion Date for missed appointments completed during the reporting period and missed due to a lack of ILEC facilities
- f = Appointment Date for missed appointments completed during the reporting period and missed due to a lack of ILEC facilities
- g = Total number of missed appointments completed during the reporting period and missed due to a lack of ILEC facilities

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Missed Appointments Average Days Late

- DS0 ..... < 3.0 Days
- DS1 ..... < 3.0 Days
- DS3 ..... < 3.0 Days
- OCn ..... < 3.0 Days

Missed Appointments Days Late Distribution

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

Missed Appointments Average Days Late Due to a Lack of ILEC Facilities

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

AIOI2: Average Intervals – Offered & Installation

Definition

Average Intervals – Offered and Installation measure provides a comprehensive view of the overall service interval being offered and the actual installation interval being achieved. This measure is a diagnostic and includes all orders completed during the reporting period.

Exclusions

- Service requests issued and subsequently canceled by the originator
- Orders associated with administrative, testing or record activities
- Disconnect Orders
- Unsolicited FOCs

Business Rules

Measures are based on the last ASR received by the ILEC and the associated FOC Due Date returned. Selection is based on orders completed by the ILEC during the reporting period. The completion date is the date noted on a completion advice to the Customer. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date. The average offered and installation intervals include all orders completed during the reporting period.

Calculation

Average Offered Interval = Sum (a - b) / c - diagnostic

- a = Offered Date or FOC Due Date for all orders completed during the reporting period
- b = Date FOC returned for all orders completed during the reporting period
- c = Total number orders completed during the reporting period

Average Installation Interval = Sum (d - b) / c - diagnostic

- b = Date FOC returned for all orders completed during the reporting period
- c = Total number orders completed during the reporting period
- d = Installation or Completion Date for all orders completed during the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Average Offered Interval

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

Average Installation Interval

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

PPDO2: Percent Past Due Orders

Definition

Percent Past Due Orders measures the percentage of orders that are past the FOC Due Date by more than 5 business days and not completed as of the end of the month due to ILEC reasons. A diagnostic view of the Percent Past Due Orders due to a lack of ILEC facilities and those held for Customer reasons (CNRs) is included.

Exclusions

- Service requests issued and subsequently canceled by the originator
- Orders associated with administrative, testing or record activities
- Disconnect Orders
- Unsolicited FOCs

Business Rules

Measures are based on the last ASR received by the ILEC and the associated FOC Due Date returned. Selection is based on orders completed by the ILEC during the reporting period. The completion date is the date noted on a completion advice to the Customer. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.

Calculation

Percent Past Due Orders – ILEC Reasons = (a / b) x 100

- a = Count at month end of uncompleted orders > than 5 business days past the FOC Due Date and missed due to all ILEC reasons
- b = Total number of uncompleted orders at month that are past the FOC Due Date for all reasons

Past Due Orders – ILEC Reasons Interval Distribution = (c - d) - Diagnostic

- c = FOC Due Date for uncompleted orders at month end that are past the FOC Due Date and missed due to all ILEC Reasons
- d = Month end date
- Past Due Orders Interval Distribution – 1-5 days, 6-10 days, 11-20 days, 21-30 days, and > 30 days

Percent Past Due Orders – ILEC Lack of Facilities Reasons = (e / b) x 100 - Diagnostic

- e = Count at month end of uncompleted orders that are past the FOC Due Date and missed due to ILEC Lack of Facilities reasons
- b = Total number of uncompleted orders at month that are past the FOC Due Date for all reasons

Percent Past Due Orders – Customer Reasons (CNRs) = (f / b) x 100 - Diagnostic

- f = Count at month end of uncompleted orders that are past the FOC Due Date and missed due to all ILEC reasons
- b = Total number of uncompleted orders at month that are past the FOC Due Date for all reasons

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Percent Past Due Orders – ILEC Reasons

- DS0 ..... < 3.0% > 5 bus days past FOC Due Date
- DS1 ..... < 3.0% > 5 bus days past FOC Due Date
- DS3 ..... < 3.0% > 5 bus days past FOC Due Date
- OCn ..... < 3.0% > 5 bus days past FOC Due Date

Past Due Orders – ILEC Reasons Distribution

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

Past Due Orders – ILEC Lack of Facilities Reasons

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

Past Due Orders – Customer Reasons (CNRs)

- DS0 / DS1 / DS3 / OCn ..... - Diagnostic

NITR2: New Installation Trouble Report Rate

Definition

New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits occurring within 30 calendar days of the installation.

Exclusions

- Trouble reports that are issued and subsequently canceled at the request of the Customer
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE), or other customer caused troubles
- Trouble reports used to track referrals of misdirected calls

Business Rules

The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to the Customer. The calculation for the following 30 calendar days is based on the creation date of the trouble ticket

Calculation

New Installation Trouble Report Rate = (a / b) x 100

- a = Count of circuits with trouble reports within 30 days of installation
- b = Total number of circuits installed in the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

New Installation Trouble Report Rate

- DS0 ..... <= 1.0
- DS1 ..... <= 1.0
- DS3 ..... <= 1.0
- OCn ..... <= 1.0

Section 3: Maintenance and Repair

CTRR2: Failure Rate / Trouble Report Rate

Definition

The percentage of initial and repeated circuit specific trouble reports completed in the reporting period per 100 circuits in service at the end of the reporting period.

Exclusions

- Trouble reports that are issued and subsequently canceled at the request of the Customer
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE), or other customer caused troubles
- Trouble reports used to track referrals of misdirected calls

Business Rules

The trouble report rate is computed by dividing the number of completed trouble reports completed during the reporting period by the total number of in-service circuits as of the end of the same period. Includes initial and repeat circuit specific trouble reports. A trouble is resolved when the ILEC issues notice to the Customer that the circuit has been restored to normal operating parameters.

Calculation

Percent Trouble Report Rate = (a / b) x 100

- a = Number of circuit specific trouble reports completed during the reporting period
- b = Total number of in-service circuits as of the end of the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

New Installation Trouble Report Rate

- DS0 ..... <= 0.83
- DS1 ..... <= 0.83
- DS3 ..... <= 0.83
- OCn ..... <= 0.83

MAD2: Average Repair Interval

Definition

The Average Repair Interval is the average duration of customer trouble reports, measured from the receipt of the customer trouble report to the time the trouble is closed, less any customer hold time or delayed maintenance time due to valid customer, Customer caused delays. The average outage duration is expressed in hours for completed circuit-specific trouble reports. A breakdown of the Average Repair Interval for troubles coded as Found OK / Test OK, or No Trouble Found (FOK/TOK/NTF), is required for diagnostic purposes.

Exclusions

- Trouble reports that are issued and subsequently canceled at the request of the Customer
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE), or other customer caused troubles
- Trouble reports used to track referrals of misdirected calls

Business Rules

The average outage duration is calculated for each trouble report closed during the reporting period. The Repair Interval start time begins with the receipt of the trouble report and ends with the clearance of that report. Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other Customer caused delays, such as holding the ticket open for monitoring, is deducted from the total repair interval for the specific trouble. The measure includes all initial and repeat circuit specific trouble reports
A trouble is resolved or closed when the ILEC issues notice to the Customer that the circuit has been restored to normal operating parameters.

Calculation

Repair Interval = (a - b)

- a = Date and time of trouble report closeout
- b = Date and time trouble report was received

Average Repair Interval = (c / d)

- c = Total of all repair intervals (in hours) for the reporting period
- d = Total number of trouble reports closed during the reporting period

Average Repair Interval – FOK/TOK/ NTF = (e / f) - Diagnostic

- e = Total of repair intervals (in hours) for all troubles coded as FOK/TOK/ NTF for the reporting period
- f = Total number of trouble reports coded as FOK/TOK/ NTF and closed during the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Average Repair Interval

- DS0	<= 2.0 Hours
- DS1	<= 2.0 Hours
- DS3	<= 1.0 Hour
- OCn	<= 1.0 Hour

Average Repair Interval – FOK/TOK/ NTF

- DS0 / DS1 / DS3 / OCn	- Diagnostic

RTRR2: Repeat Trouble Report Rate

Definition

Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had a prior trouble ticket closed any time in the 30 calendar days preceding the creation date of the current trouble report.

Exclusions

- Trouble reports that are issued and subsequently canceled at the request of the Customer
- Trouble reports associated with internal or administrative activities
- Customer Provided Equipment (CPE), or other customer caused troubles
- Trouble reports used to track referrals of misdirected calls

Business Rules

A trouble is resolved or closed when the ILEC issues notice to the Customer that the circuit has been restored to normal operating parameters. Where the previous trouble ticket is closed with the disposition code as FOK/TOK/NTF/CPE/IXC, then the second trouble must be counted as a repeat trouble report. The trouble resolution need not be identical between the initial and repeat report for the second report to be counted as a repeat.

Calculation

Repeat Trouble Report Rate = (a / b) x 100

- a = Total of all trouble reports closed during the reporting period with a previous trouble closed on the same circuit in the 30 calendar days preceding the creation date of the current trouble
- b = Total number of trouble reports closed during the reporting period

Report Structure

- As per Reporting Dimensions (page 3)

SQM Disaggregation – Benchmark

Repeat Trouble Report Rate

- DS0 ..... <= 6.0 %
- DS1 ..... <= 6.0 %
- DS3 ..... <= 3.0 %
- OCn ..... <= 3.0 %

GLOSSARY

Term	Definition
Access Service Request (ASR)	A request to an ILEC to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms specified in the local exchange company's special or switched access tariffs
Business Days	Monday thru Friday excluding holidays
CDDD	Customer Desired Due Date
Customer	These Special Access Performance Metrics apply to the Special Access Service provided by the ILECs to CLECs, IXCs, Wireless Carriers, and Large End Users. The reporting definitions and business rules contained herein refer to these groups collectively as the "Customer."
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of the ILEC that prevents the ILEC from completing an order, including the following: Customer is not ready; end user is not ready; connecting company, or CPE (Customer Provided Equipment) supplier, is not ready
Facility Check	A pre-provisioning check performed by the ILEC, in response to an access service request, to determine the availability of facilities and assign the installation date
Firm Order Confirmation (FOC)	The notice returned from the ILEC, in response to an Access Service Request, whether an initial or supplement ASR, from a Customer that confirms receipt of the request, and provide the Customer with the specific due date on which the circuit or circuits will be installed
Project	Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes
Query/Reject	An ILEC response to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued
Repeat Trouble	Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days
Service Order	The work order created, and distributed in the ILEC's systems, in response to a complete and valid access service request (ASR)
Supplement ASR	A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.
Unsolicited FOC	An Unsolicited FOC is a supplemental FOC issued by the ILEC to change the due date or for other reasons, although no change to the ASR was requested by the Customer

ATTACHMENT B

Comparison of BellSouth and JCIG Proposed Measurements

FOCT2: Firm Order Confirmation Timeliness		
	BellSouth Proposal	**JCIG Proposal**
Definition	Firm Order Confirmation Timeliness measures the percentage of FOCs returned within the standard interval. Facilities check to be performed prior to the return of a FOC*	Firm Order Confirmation (FOC) Timeliness measures the percentage of FOCs returned within the standard interval. A minimum of an electronic facilities check will be performed prior to the return of a FOC
Exclusions	• Service Requests canceled by the originator • Unsolicited FOCs • Administrative or test requests • Service Requests identified as Projects • Weekends and designated holidays for the service centers	• Service requests canceled by the originator • Unsolicited FOCs • Administrative, test or record requests • Disconnect ASRs
Business Rules	• Counts are based on each instance of a FOC being sent • Days are business days (M-F) excluding holidays • Activity started on a weekend or holiday will take the next business day • Activity ended on a weekend or holiday will take the previous business day • Requests received after 3 pm will be counted as a zero day interval if the FOC is sent by the close of business on the next business day	• Counts are based on each instance of a FOC sent • Days calculated are business days, M-F, excluding National Holidays • Activity starting on a weekend, or holiday, will reflect a start date of the next business day • Activity ending on a weekend, or holiday, will be calculated with an end date of the previous business day • Service requests identified as projects are excluded from the Percent Within Standard Interval calculation, but are included as a diagnostic disaggregation under the Percent FOC Completeness and FOC Interval Distribution
Disaggregation	• DS0 (2 Days) • DS1 (2 Days) • DS3 Non-Optical (5 Days) • DS3 Optical (ICB) • FGD (2 Days)	• DS0 (2 Days) • DS1 (2 Days) • DS3 (5 Days) • OCN (ICB) • Project vs. non-project (diagnostic)

* Letter from J. Phillip Carver, BellSouth, to Marlene H. Dortch, FCC Secretary, CC Docket No. 01-321, *et al.*, at 9 (Aug. 6, 2004).

PIAM2: Percent Installation Appointments Met		
	BellSouth	**JCIG**
Definition	Percent Installation Appointments Met measures the percentage of installation commitments completed on/before the current committed due date	Percent Installation Appointments Met measures the percentage of installation commitments completed on or before the current committed due date. For diagnostic purposes, the Percent Installation Appointments Met is calculated both with CNR consideration, and without CNR consideration
Exclusions	• Orders issued and subsequently canceled • Orders associated with internal or administrative activities • Disconnect Orders • Carrier caused or end-user misses	• Orders issued and subsequently canceled by the originator • Orders associated with administrative, test, or record activities • Disconnect orders • Unsolicited FOCs
Business Rules	• Calculated by dividing number of service orders completed on or before the committed due date by the total number of orders committed to completion during the same reporting period • Only BST missed appointment codes will be counted as a miss (numerator) • The first valid missed appointment codes will be used to determine whether an order is considered missed	• Calculated by dividing the number of service orders completed during the reporting period, on or before the FOC due date by the total number of orders completed during the same reporting period • The measurement is calculated both with and without CNR consideration • Measures are based on the last ASR received by the ILEC and the associated FOC Due Date returned • Selection is based on orders completed by the ILEC during the reporting period • The completion date is the date noted on a completion advice to the Customer • Projects are included
Disaggregation	• DS0 • DS1 • DS3 Non-Optical • DS3 Optical • FGD	• DS0 • DS1 • DS3 • OCN • Without CNR consideration (diagnostic)

NITR2: New Installation Trouble Report Rate		
	BellSouth	**JCIG**
Definition	New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation*	New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits occurring within 30 calendar days of the installation
Exclusions	• Trouble tickets canceled at customer request • Customer Provided Equipment (CPE) or other customer caused troubles • BST troubles associated with administrative service • Troubles outside of BST control	• Trouble tickets canceled at the request of the Customer. • Customer Provided Equipment (CPE), or other customer caused troubles • Trouble reports associated with internal or administrative activities • Trouble reports used to track referrals of misdirected calls
Business Rules	• Only the first customer direct trouble report received within 30 days of a completed service order is counted in this measure.* Subsequent reports are excluded • Only customer direct trouble reports that require physical repair work by BST will be counted in this report • Reports are calculated by searching in the prior report period for completed service orders and the following 30 days after completion of the service order for a trouble report issues date* • BST completion date is the date upon which BST completes installation of the circuit • The calculation for the following 30 calendar days is based on the creation date of the trouble ticket*	• The ILEC Completion Date is the date upon which the ILEC completes installation of the circuit, as noted on a completion advice to the Customer • The calculation for the following 30 calendar days is based on the creation date of the trouble ticket
Disaggregation	• DS0 • DS1 • DS3 (Non-Optical) • DS3 (Optical OCN) • FGD	• DS0 • DS1 • DS3 • OCN

* BST has agreed to include any troubles reported within 30 day of a new installation. *See* Attachment to Letter from Mary L. Henze, BellSouth, to Marlene Dortch, FCC Secretary, CC Docket No. 01-321, *et al.*, at 5 (July 16, 2004).

CTTR2: Failure Rate/Trouble Rate		
	BellSouth	**JCIG**
Definition	The percentage of initial and repeated circuit specific trouble reports completed per 100 circuits in-service for the reported period	The percentage of initial and repeated circuit specific trouble reports completed in the reporting period per 100 circuits in service at the end of the reporting period
Exclusions	• Trouble tickets issued and subsequently canceled • Trouble reports associated with internal or administrative activities • Customer Provided Equipment (CPE) or other customer caused troubles • Employee initiated trouble reports • Reciprocal Services • Tie circuits • Troubles outside of BST control	• Trouble tickets issued and subsequently canceled at the request of the Customer. • Trouble reports associated with internal or administrative activities • Customer Provided Equipment (CPE), or other customer caused troubles • Tickets used to track referrals of misdirected calls
Business Rules	• The trouble report rate is computed by dividing the number of completed trouble reports handled during the reporting period by the total number of in-service circuits for the same period • Only customer direct trouble reports, which require physical repair work by BST, will be counted in this report	• The trouble report rate is computed by dividing the number of trouble reports completed during the reporting period by the total number of in-service circuits as of the end of the same period • Includes initial and repeat circuit specific trouble reports • A trouble is resolved when the ILEC issues notice to the Customer that the circuit has been restored to normal operating parameters
Disaggregation	• DS0 • DS1 • DS3 (Non-Optical) • DS3 (Optical OCN) • FGD	• DS0 • DS1 • DS3 • OCN

MAD2: Average Repair Interval		
	BellSouth	**JCIG**
Definition	The Average Repair Interval is the average duration of customer trouble reports, measured from the receipt of the customer trouble report to the time the trouble report is closed. The average outage duration is expressed in hours for completed circuit-specific trouble reports	The Average Repair Interval is the average duration of customer trouble reports, measured from the receipt of the customer trouble report to the time the trouble is closed, less any customer hold time or delayed maintenance time due to valid Customer caused delays. The average outage duration is expressed in hours for completed circuit-specific trouble reports. A breakdown of the Average Repair Interval for troubles coded as Found OK / Test OK, or No Trouble Found (FOK/TOK/NTF), is required for diagnostic purposes
Exclusions	• Trouble tickets issued and subsequently canceled • Customer Provided Equipment (CPE) or other customer caused troubles • BST troubles associated with internal or administrative activities • Reciprocal Trunks • Employee initiated trouble reports • Tie Circuits • Troubles outside of BST control	• Trouble reports issued and subsequently canceled at the request of the Customer. • Customer Provided Equipment (CPE), or other customer caused troubles • Trouble reports associated with internal or administrative activities • Trouble reports used to track referrals of misdirected calls
Business Rules	• The average duration is calculated for each restored trouble report • The start time begins with the receipt of the trouble report and ends with the clearance of that report • Customer hold time or delay maintenance time resulting from verifiable situation of no access to the end user premise, other CLEC/IXC or BST Aggregate caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval • Only customer direct trouble reports, which require physical repair work by BST, will be counted in this report	• The average outage duration is calculated for each trouble report closed during the reporting period • The start time begins with the receipt of the trouble report and ends with the clearance of that report • Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other Customer caused delays, such as holding the ticket open for monitoring, is deducted from the total repair interval for the specific trouble • The measure includes all initial and repeat circuit specific trouble reports • A trouble is resolved or closed when the ILEC issues notice to the Customer that the circuit has been restored

		to normal operating parameters
Disaggregation	• DS0 • DS1 • DS3 (Non-Optical) • DS3 (Optical OCN) • FGD	• DS0 • DS1 • DS3 • OCN

JCIG measures for which there are no BellSouth analogues:

- OVRD2: Offered vs. Requested Due Date
- MADL2: Missed Appointments Average Days Late
- AIOI2: Average Intervals – Offered and Installation
- PPDO2: Percent Past Due Orders
- RTRR2: Repeat Trouble Report Rate

BellSouth measure for which there is no JCIG analogue:

- PIC: Average PIC Change Interval

ATTACHMENT C

Response to Recent BOC Ex Parte Filings

Comments in Response to Recent BOC Ex Parte Filings

BellSouth July 16, 2004

BellSouth stated in its ex parte filing of July 16, 2004 that it was responding to questions asked by FCC staff. JCIG briefly comments on two of BellSouth's responses labeled in the BellSouth filing as Question 2b and Question 3.

BellSouth Response to Question 2b: Despite BellSouth's claims, its PIAM-2 measure does not address the concerns underlying JCIG's original "Days Late" measure (renamed "Missed Appointments Average Days Late" in the revised proposal). The PIAM-2 measure, while useful, captures only the percentage of appointments that were missed. It does not provide any information regarding how long it took the incumbent LEC to complete those installations once the initial due date passed. Even if only a relatively small percentage of installations are performed late, it is still critical that those orders be completed as quickly as possible even after the incumbent LEC misses its committed due date. BellSouth's contention that "it would be difficult to argue reasonably that a higher days late value . . . reflects worse performance than a lower days late value"[1] is meritless. Once the incumbent LEC has missed the due date to which it committed, every additional day of delay before the order is finally completed simply compounds the problems (*e.g.*, lack of service; loss of revenue) caused by the missed installation.

BellSouth Response to Question 3: JCIG disagrees with BellSouth's assertion that the Commission should accommodate differences among incumbent LECs by, for example, allowing each reporting carrier to measure intervals in different units of time (*e.g.* hours vs. days).[2] The reporting process must be uniform for all incumbent LECs. In the absence of uniform intervals, it will be impossible to assess whether the incumbent LECs are meeting the benchmark standards that JCIG has proposed. Even if the Commission were to decide not to adopt benchmark standards, uniform reporting would still be necessary to allow customers and regulators to make accurate comparisons between incumbent LECs and to determine best practices. Therefore, JCIG agrees with BellSouth that any performance plan adopted by the FCC must be sufficiently detailed and precise to make clear "precisely the universe of activities to be measured, the formula to be used to calculate performance and the standard to be used" to determine the adequacy of performance.[3] Indeed, as JCIG has stressed in previous filings, it is imperative that the plan include specific business rules, definitions, descriptions and reporting requirements designed to limit the incumbent LECs' discretion regarding how

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[1] Attachment to Letter from Mary L. Henze, BellSouth, to Marlene Dortch, FCC Secretary, CC Docket No. 01-321, *et al.*, at 4 (July 16, 2004) ("*BST letter of July 16*").

[2] *See BST letter of July 16* at 4-5; *see also* Letter from Michelle A. Thomas, SBC, to Marlene H. Dortch, FCC Secretary, WC Docket No. 02-112, at 1 (July 29, 2004) ("*SBC letter of July 29*").

[3] *BST letter of July 16* at 4.

to measure and report the relevant data. Accordingly, each incumbent LEC must collect, calculate and report the relevant data in the same manner.

BellSouth August 6, 2004

Definition of CNR. BellSouth's criticism of JCIG's proposed definition of CNR (customer not ready) situations,[4] is odd in light of the fact that the definition of CNR listed in the Glossary attached to BellSouth's proposal is practically identical to JCIG's proposed definition. Both proposals exclude only "verifiable situation[s] beyond the normal control" of the ILEC.[5]

Disconnect ASRs. BellSouth argues that disconnect orders should be included in the measurements because "the disconnection of a switched access circuit is not simple."[6] JCIG's proposal covers only special access, however. BellSouth's argument, even if true, is therefore irrelevant.

Repeat troubles. BellSouth properly includes repeat troubles in its CTRR2 and MAD2 measures.[7] These measurements do not provide sufficient detail, however, as neither measure allows customers or regulators to identify chronic repair situations that are likely to aggravate end-user customers. A separate "Repeat Trouble Report Rate" measure, which is a common industry metric, is essential to isolate chronic failures and allow carriers to take specific action to address the underlying problems.

SBC July 29, 2004

JCIG strongly disagrees with SBC's contention that the metrics the Commission adopts should not include service provided to BOC retail end-user customers.[8] All Tier 1 incumbent LECs should be required to provide customer-specific reports to all special access customers and to file aggregated reports for unaffiliated CMRS providers, affiliated CMRS providers, competitive wireline carriers, affiliated wireline carriers and end-user customers. Unless the metrics and reporting requirements include service provided to retail end users, customers and regulators will not be able to determine whether the incumbent LECs are engaging in unlawfully discriminatory practices that favor their own end-user customers.

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[4] *See* Letter from J. Phillip Carver, BellSouth, to Marlene H. Dortch, FCC Secretary, CC Docket No. 01-321, *et al.*, at 7 (Aug. 6, 2004) ("*BellSouth letter of August 6*").

[5] *Compare* BellSouth Service Quality Measurement Plan, attached to Letter from Kathleen B. Levitz, BellSouth, to Marlene H. Dortch, FCC Secretary, CC Docket No. 01-321, *et al.*, at 10 (Apr. 29, 2004) *with* JCIG's revised proposal, *supra* at Att. A, at 17.

[6] *BellSouth letter of August 6* at 9.

[7] *BellSouth letter of August 6* at 11-12.

[8] *SBC letter of July 29* at 2.

BOC filings describing internal processes

Qwest, SBC and Verizon have all filed presentations depicting their internal processes for special access ordering, provisioning and maintenance.[9] As these filings demonstrate, all of the BOCs' processes are built around the same key events. For example, each BOC's ordering and provisioning process is triggered by the receipt of an ASR, followed by: (1) the return of a FOC to the customer with a due date, (2) the dispatching of a technician on the due date, and (3) notification to the customer that the installation has been completed. Similarly, each maintenance and repair process is triggered by the receipt of a trouble ticket and followed by the dispatching of a technician and, subsequently, notification to the customer and closure of the trouble ticket. The JCIG metrics simply capture the incumbent LECs' performance for each of these key events.

The underlying procedures, software and support systems used by the incumbent LECs need not be uniform for customers or regulators to measure and evaluate the incumbents' performance effectively. Indeed, the processes used by the individual BOCs are irrelevant to the question of what metrics the FCC should adopt to ensure adequate special access performance. The FCC should adopt rules and metrics that reflect customers' expectations of just, reasonable and nondiscriminatory service. Customers are interested only in the level of service the BOCs are able to provide. Accordingly, the FCC should focus on the BOCs' ability to provide acceptable levels of service, not on the internal mechanisms used to achieve those results.

[9] *See* Letter from Cronan O'Connell, Qwest, to Marlene H. Dortch, FCC Secretary, CC Docket No. 01-321, *et al.* (Aug. 19, 2004); Letter from Brian Benison, SBC, to Marlene H. Dortch, FCC Secretary, CC Docket No. 01-321, *et al.* (Aug. 19, 2004); Letter from Tyrone Keys, Jr., Verizon, to Marlene H. Dortch, FCC Secretary, CC Docket No. 01-321, *et al.* (Aug. 30, 2004).